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**Docket:** NRC-2018-0052

Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Comment On:** NRC-2018-0052-0300

Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Document:** NRC-2018-0052-DRAFT-0358

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## General Comment

NRC's time-limited focus on just 40 years of "temporary storage" is inappropriately, arbitrarily short, given Holtec's own admission in its license application to NRC that "interim storage" could persist for 120 years; in response to a Request for Information from DOE, Holtec admitted a CISF could operate for 300 years; and in NRC's own 2014 Continued Storage of Spent Nuclear Fuel Rule and Generic EIS, the agency acknowledged away-from-reactor ISFSIs (Independent Spent Fuel Storage Installations) could go on indefinitely (that is, forevermore).

Institutional control could be lost over such long time periods. Failed containers could release catastrophic amounts of hazardous radioactivity directly into the surface environment, to blow downwind, flow downstream, bioconcentrate up the food chain, and harm people down the generations.

NRC's treatment of highly radioactive waste transport risks is inadequate, and nearly non-existent.. This violates the long-established legal requirement under the National Environmental Policy Act (NEPA) that NRC take a "hard look" at the Holtec CISF proposal, including its inextricably linked high-risk transportation component, affecting most states in the Lower 48. (See the 2017 transportation route and shipment number documents posted online by the State of Nevada Agency for Nuclear Projects, its analysis of the same 2008 U.S. Department of Energy document that NRC itself cites as its excuse for not having to do a Holtec-specific transport analysis in 2020!)