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Holtec International HI-STORE Consolidated Interim Storage Facility Project

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Holtec International HI-STORE Consolidated Interim Storage Facility Project

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Submitter Information

Name: Anonymous Anonymous

General Comment

1.The Nuclear Regulatory Commission's Draft Environmental Impact Statement fails to consider all the different alternatives to Holtec's consolidated "interim" storage in New Mexico.

Holtec should be required to present alternatives including continued storage at the current reactors and permanent regional storage that is within 50-100 miles of the current sites. Holtec should also be required to identify a permanent repository for the radioactive waste. None has been identified, though federal law requires it.

2.The Draft Environmental Impact Statement fails to provide data on the increased presence of radiation on the region importing the high-level nuclear rods.
Data must be provided on the radiation level from each reactor and how much above-normal radiation would be imported to the proposed site.

3. The draft fails to provide thorough information on the financial impact of the proposed storage site on current employment and revenues in the area.
Holtec should be required to provide information on the impact of the construction on employment and revenues.

4. The draft fails to provide a process or insurance for reimbursement to the state of New Mexico for loss of revenues, jobs or personal injuries because of the storage site and related activity.

Holtec should be required to provide financial assurances that cover losses to the State of New Mexico from construction of the facility as well as restoration of the site or for any regional site or local site for which

storage is administered.

5. The NRC has limited the environmental analysis to 40 years, though the agency knows that's not a reasonable time period. Holtec itself says that the site needs to operate for 120 years, and without a repository, the site would operate forever.