

From: L. Watchempino <5000wave@gmail.com>
Sent: Wednesday, June 17, 2020 3:36 AM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Comment against Holtec CIS Docket ID NRC-2018-0052

U.S. Nuclear Regulatory Commission (Holtec CIS)

RE: Comment against Holtec CIS Docket ID NRC-2018-0052

Dear ,

Comment to US NRC on proposed HOLTEC Consolidated "Interim" Storage Facility Docket ID NRC-2018-0052

Extend the Comment Period//Hold Public Meetings in New Mexico and along transport routes

Over 80 organizations requested the NRC to suspend all activities involving public input until the COVID-19 crisis is over and then to allow 6 months for public review and comment on the DEIS for this proposed interim storage facility. I further request that public meetings on the Holtec DEIS be held when it is safe to do so in communities along the potential transport routes in New Mexico, Texas and other corridor states, especially those with large urban areas including but not limited to Atlanta, Chicago, Cleveland, Dallas/Fort Worth, Detroit, Nashville, Minneapolis/St Paul, New York/Newark, Omaha, Philadelphia, Pittsburgh, San Antonio, and Saint Louis.

DEIS Violates the National Environmental Policy Act by Failing to Analyze Transport Impacts

The DEIS does not show the transport routes that will be used to ship high level nuclear waste to the Holtec interim storage site in southeast New Mexico and fails to adequately analyze the significant risks of transport through multiple states over many decades.

Thousands of shipments, each with more radioactive cesium than released from Chernobyl and more plutonium than was released by the bombing of Nagasaki, would emit radiation as they are transported along our roads, rails, and waterways through multiple states and Congressional districts for decades. Each shipment has the capacity to decimate the regions through which they travel with radioactive contamination, whether accidental or as a result of deliberate acts of terrorism or sabotage. Dangerous levels of radiation will be released during the routine transfer of spent nuclear fuel from storage containers to transfer casks and back again as they are transported from the reactor site to the interim storage site. The entire process will be repeated when the spent fuel is transported to a permanent repository.

The DEIS also fails to analyze the additional transport risks of moving the waste again to a permanent geologic repository.

Environmental Justice

Pursuant to the heightened awareness of institutional racism in this country, I object to the transport of dangerously high level nuclear waste through impoverished communities of color whose health and environment have already been disproportionately impacted by the nuclear fuel chain. The trunk rail lines that will deliver most of the high level radioactive waste to the proposed Holtec storage site are routed through older neighborhoods and core areas of American cities.

All environmental justice communities along the transport route must be provided opportunities for meaningful public comment through public hearings in their communities with interpreters as needed and accessible Spanish language materials covering the proposed project.

Eddy and Lea counties possess large Hispanic populations that have already been disproportionately impacted by numerous other industrial facilities that pollute the air and threaten local water supplies .

Failure to Consider Alternatives

Rather than considering a range of alternatives to consolidated interim storage of the nation's high level nuclear waste, the DEIS only analyzes other consolidation options. It fails to analyze a No Action alternative that leaves the waste in place near the nuclear reactor sites where it was generated. The DEIS also fails to adequately address the requirements of the Nuclear Waste Policy Act of 1982 which supports the use of deep geologic repositories for the safe storage and permanent disposal of radioactive waste.

Threats to Water

The DEIS fails to adequately characterize and assess the radiological threats to water beneath the proposed site from leaking or compromised containers. In addition, water bodies across the country including the Great Lakes, Chesapeake Bay, rivers, lakes and oceans will be subjected to a variety of accidental risks during the transport of high level nuclear waste across the country to the interim storage site.

Inadequate Storage and Transport Containers

Monitored retrievable storage containers must be required at all interim storage sites. If the irradiated fuel in a container cannot be monitored, inspected, or retrieved for repackaging, NRC certification is meaningless . No container will last as long as irradiated ("spent") fuel remains dangerous and deadly. NRC must require a plan for replacing damaged or worn out containers during interim storage, and for transfer to and from transport casks upon arrival at the interim storage site, and later removal to a deep geologic repository.

The application predicts the "interim" storage period to last from several decades to a century or longer, time frames that could exceed the service life of both the spent fuel containers and the interim storage facility.

June 4, 2020 Executive Order

The June 4,2020 Executive Order provides no justification for bypassing the requirements of NEPA or the Endangered Species Act. The COVID-19 health pandemic instead provides ample reason to extend the public comment period for this DEIS and to schedule public hearings in communities along the

transport route where millions of people could be affected by the transport of high level nuclear through the places where they live, work and play.

Submitted by:

Sincerely,
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