

From: Jim Mullany <jhmullany@yahoo.com>
Sent: Thursday, July 9, 2020 12:16 PM
To: Holtec-CISFEIS Resource
Cc: James Mullany
Subject: [External_Sender] Holtec: Dumping high-level radioactive waste in New Mexico

I have worked in the environmental field throughout New Mexico for over thirty years. These are my specific and general concerns with the Holtec project. I would appreciate your attention and commentary on them, particularly official Federal DOE commentary.

1) Regarding the site of the project: Holtec is far from the first company to want to dump radioactive waste in SE New Mexico. The fraught "Waste Isolation Pilot Plant" dump in Carlsbad is a cautionary tale, not a successful precedent. WIPP site in Carlsbad has experienced multiple releases of a wide spectrum of radioactive isotopes.

In my experience, DOE consultants have been paid to say: "New Mexico is so very, very, dry, it's a perfect state to dump plutonium in!" One visit can confirm that the surface of Carlsbad is very dry. But the WIPP project inadvertently revealed that the geology beneath Carlsbad - far from being dry - is a fully saturated aquifer, ready and able to transport waste dumped into it far and wide. It has very high-TDS groundwater, but can readily dissolve and move plutonium and other transuranic elements through the very large regional aquifer. Holtec operator error could transform thousands of square miles of SE New Mexico into a dead zone for thousands of years. Has this risk been analyzed and weighed against the "do nothing" option?

Nevada very rightly refused to allow the Yucca Mountain high-level Plutonium dump to open, for the very same waste as the Holtec project. This project is the power companies "Plan B" and should also be rightfully rejected by New Mexico. The environmental risks are just too large and permanent.

2) Assuming this massive quantity of high-level waste is dumped in SE New Mexico, it is clear from America's waste history that bureaucratic inertia will ensure that it will stay here and contaminate our beautiful state for hundreds of thousands of years, no matter what the politicians of today tell us.

As a reminder to the non-technical: Plutonium-239, toxic in parts-per-trillion, has a half life of over 24,000 years, far longer than the human race will be in existence. Even after 24,000 years HALF of this EXTREMELY toxic material will still be highly radioactive, spewing thousands tons of waste into the groundwater, soil and air of New Mexico, and presumably West Texas.

3) Please explain the urgency in siting this Holtec dump, in detail. The many states that most benefitted from the fuel rods are already storing these rods. There are no front-page environmental problems with this storage other than power companies wanting someone else — via their DOE enablers — to take care of this expensive problem for them. The rods appear safe enough where they are, in carefully monitored facilities. Again, what perceived urgency is driving this project? None that I can see, other than power company greed. Increasing New Mexico's exposure to high level radiation solely because of corporate greed does not seem reasonable or fair. Or legally defensible.

4) Transportation of these fuel rods to New Mexico — either via rail or national highway — presents a massive, unacceptable public exposure risk as well as presenting the risk of terrorist access to dirty-bomb material. Has this project fully canvassed citizens along the projected routes of transport to see what their views of Chernobyl-level radiation passing through their towns for decades? As nuclear plants demonstrate, fuel rods emit radiation that requires massive shielding to keep workers safe. Fuel rod transports obviously cannot also transport thousands of tons of lead shielding with the rods, meaning that the rods will be emitting high-level radiation every inch of the way from dump to dump.

This is not just a New Mexico project; the states that produced this waste will be forcing many other states to accept large, on-going risks. Where is the national discussion? All the other states involved should be weighing in on the clear public health risks associated with this project.

5) In conclusion: The safest, cheapest, and most promising alternative to this project is to do nothing. Let the plutonium-waste-producing states continue to store and monitor their fuel rods and high-level waste. That will ensure that the waste is fully contained, doesn't leak and is carefully monitored. Dumping highly radioactive fuel rods in our state means that the rest of the country can finally turn their backs on this waste and let it go where it will. And where it will go is into the bodies of New Mexico citizens and whoever might be living in SE New Mexico thousands of years from now.

The Holtec project should be rejected on geotechnical, national security, and public safety grounds. States should be required to keep the waste they've generated and figure out how to go forward with that without contaminating other states and endangering American lives merely for corporate profit.

Thank you for your attention.

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