

From: L. Watchempino <info@sg.actionnetwork.org>
Sent: Monday, July 13, 2020 5:00 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Halt the license for radioactive waste storage

office of administration,

Office of Administration

Mail Stop: TWFN-7-A60M

Attn: Program Management, Announcements and Editing Staff

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

RE: Draft Environmental Impact Statement (DEIS), Docket No. 72-1050; NRC-2016-0231 Interim Storage Project's license application to construct and operate a Consolidated Interim Storage Facility (CISF) for spent nuclear fuel (SNF) and Greater-Than Class C (GTCC) waste.

Dear NRC Commissioners and Staff,

Interim Storage Project's application would lead to the import and storage of 40,000 tons of spent nuclear fuel from nuclear reactors around the country in Andrews County, Texas, for 40 years, or perhaps forever. This environmentally unjust plan and would target a largely Latinx region of the country with the deadliest nuclear waste. The region is unsuitable for storing nuclear waste since it's prone to earthquakes, sinkholes, temperature extremes, wildfires, intense storms and flooding.

Nationwide, this plan would jeopardize the health and safety of millions of people unnecessarily due to risks from potential leaks, sabotage or transportation accidents. Consolidated interim storage is an illegal band-aid approach to the permanent disposal and isolation of high-level radioactive waste that is required by the Nuclear Waste Policy Act Amendments of 1987.

The NRC has ignored many key health and safety issues raised in thousands of previous comments and in 100 legal contentions, many of which were backed by expert

testimony. The inadequate Draft Environmental Impact Statement (DEIS) shows that the NRC is still not addressing these concerns.

No hot cell is proposed, which should be mandatory for this type of facility. There would be no way to repackage radioactive waste from a cracked or leaking canister, which could trigger a criticality affecting the totality of all consolidated waste at the site.

Threats from terrorism aren't adequately addressed and the potential use of drones wasn't considered. There is no discussion of how the waste could go critical and under what conditions this could occur. Hardened Onsite Storage Systems (HOSS) was not considered as an alternative to Consolidated Interim Storage, a glaring omission.

Transportation routes were not designated and accident risks have been artificially minimized. State of Nevada Yucca Mountain studies found that a single small accident could permanently contaminate 42 square miles of land. Radioactive Waste Management Associates' found that 1370 latent cancer fatalities could result from a rail accident with spent nuclear fuel, with costs of \$145 - \$270 billion for a severe accident. The DEIS ignores available scientific data and incorrectly ignores these risks.

The DEIS fails to adequately analyze the cumulative impacts of the proposed facility and other nearby waste disposal and nuclear sites on workers, local people and the environment. Natural disasters or an accident could also result in cumulative impacts. A fire and a subsequent radiation release at the nearby WIPP site cost \$2 billion to remediate, but this was never mentioned. The DEIS fails to analyze impacts of potential groundwater could have on viability of the storage pad, which must be able to support extremely heavy casks and canisters.

The risks of creating a dangerous de facto permanent site were not analyzed, although Former NRC Chairman Gregory Jaczko has said that a consolidated interim storage facility is likely to become a permanent facility. The avoidable risks of moving nuclear waste across the country to a site not designed for permanent disposal were not considered in the DEIS.

Dumping the most high level nuclear waste of for-profit private corporations that have already

received the benefits of government largesse on the largely
Latinx Southwest region is the height of environmental injustice.

Analysis of impacts to the soil, air, wildlife, vegetation and aquifers of this region
and transport regions along the way is inadequate. Businesses that will be affected by the
transport and long-term storage of high level radioactive waste at this storage facility include
pecan growers, the
ranching and dairy industries and the oil and gas industry.

I oppose Consolidated Interim Storage of highly irradiated spent nuclear fuel at this facility.
This dangerous nuclear waste must remain where it was generated until it can be subjected
to deep geologic isolation in a permanent repository. The DEIS fails to adequately account for
all the environmental, socioeconomic, and cumulative impacts that the consolidated storage
of high level radioactive waste entails. The NRC must halt the application process and deny
the license for Consolidated Interim Storage to protect our public health and safety.

Thank you,

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