

From: Christopher L <ctm_logan@yahoo.com>
Sent: Tuesday, August 4, 2020 2:30 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] No EIS approval for "interim" storage
Attachments: No EIS approval for Interim Storage Partners.pdf

Greetings, NRC Officials!

Hoping that you will indeed *read* the comments you receive, concerning the **EIS ambitions of Interim Storage Partners**, for an "interim" nuclear disposal site in **Andrews County, Texas**, I attach my testimony below.

I have the time and ability to write a complex argument, and have the time and other circumstances to be able to write to you. But I'm speaking for a huge number of people who are horrified at your plans to let private industry store **100-year-rated cans of nuclear waste** in the Southwest, with nothing to separate them from the living world but a cyclone fence. The fiction, that this is "interim" is also well understood to be smoke and mirrors. You just want to get legally "rid of it".

The presumption was once common, that an American government official should be working in the best interests of the American people. The people will gain no benefit from having nuclear waste transported through their towns and counties, past their farms and homes, down their waterways. In fact, the people will be threatened with cancer, mutation, property destruction (no use having a rice field in Fukushima these days) ... and for what? So you can allow the nuclear industry unfettered growth, to produce *more* nuclear waste.

You're dealing in the world's most horrific substances, and many will remain horrific virtually forever. That you should even consider such an irresponsible plan seriously questions your qualifications to serve the people of the United States. But I hope that the testimony you hear from citizens who are awake and concerned will convince you to **deny the EIS application of Interim Storage Partners**, and completely rethink this ill-conceived plan to store the nation's nuclear waste on a patch of sand in some "remote location".

Sincerely,
Christopher Logan

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Christopher Logan
August 5, 2020

Office of Administration
U.S. Nuclear Regulatory Commission
RE: EIS for Interim Storage Partners' proposed nuclear waste dump in Texas

Greetings!

You are currently on a breakneck rush to secure “interim” storage in Texas for about 40,000 metric tons of highly radioactive nuclear waste. At this point, a small hurdle presents: **the EIS**. No problem, the NRC will take care of that – wink, wink – because they are the ones who promised to take the waste to a storage site, releasing from responsibility those power companies who have produced the most poisonous substances on Earth, purely for profit. Now, those companies will be able to produce more, without regard to the million-year future of this horrific poison.

The above is a reasonable summary of NRC activities *so far*. In fact, Holtec has issued this, in a self-congratulatory document on their website:

- March 11, 2020

We are pleased to announce that the United States Nuclear Regulatory Commission (USNRC) has issued a draft environmental impact statement for Holtec International's proposed consolidated interim storage facility (CISF) called HI-STORE CISF in southeastern New Mexico. The draft Environmental Impact Statement (EIS) includes the NRC staff's preliminary recommendation that there are **no environmental impacts** that would preclude the NRC from issuing a license for environmental reasons.

There are lots of potential environmental impacts, but they're inconvenient to consider. Now we're ready for Round 2, with Interim Storage Partners, in Texas. You could decide to take the same insane path, the one that keeps you on friendly terms with the nuclear industry and allows it to proliferate nuclear waste for another generation, free of concern for the waste it generates. **BUT YOU COULD CHANGE COURSE.**

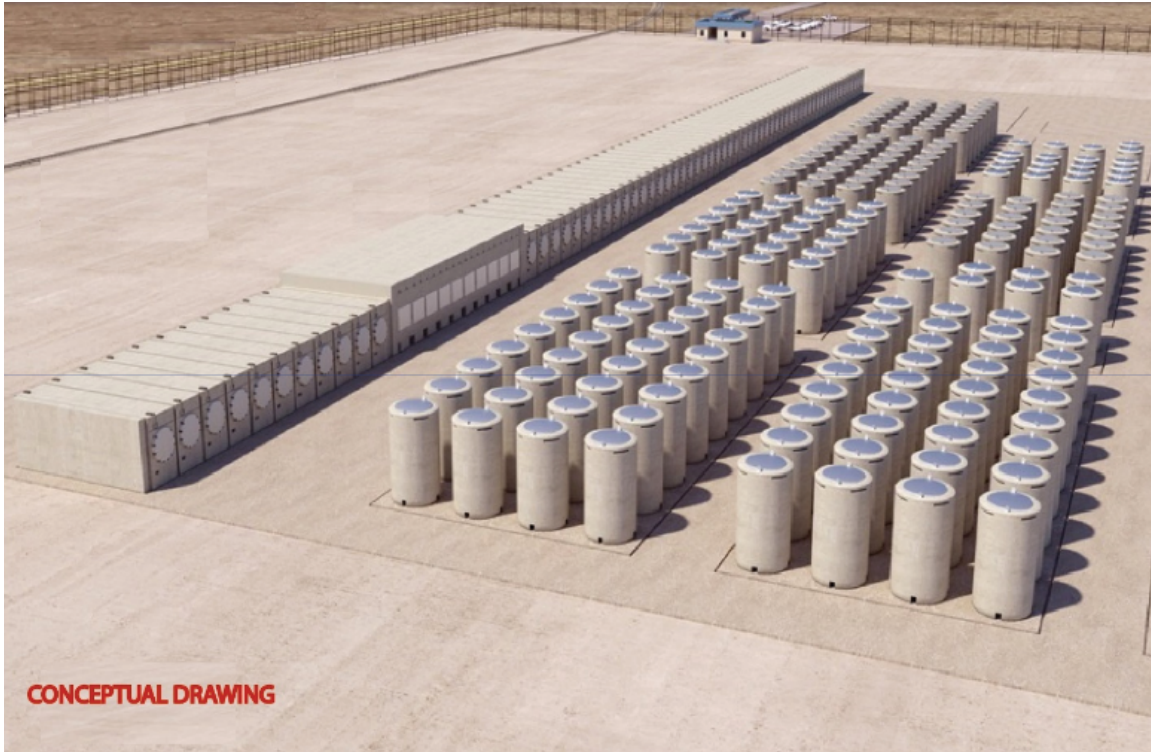
You could decide to **take a good look at the environment itself**: not just the sand around Andrews, Texas, but the Ogallala Aquifer, the Rio Grande, the people who live in towns nearby – and the whole world, really, because **after those dry casks crumble, nuke waste is going to leak out of its cans**. Those cans are rated for 100 years, and most companies go out of business in that length of time. Certainly no company will last for the million years or so this stuff will be deadly poison and a danger to the DNA of humans, turtles, trees and birds. **You could care about our environment** and reject nuclear waste being dumped out in the desert while civilizations rise and fall, companies go broke, and the technology to cope with nuclear waste possibly disappears forever.



Transportation Risks

Time after time we've heard the nuclear industry (and the NRC!) tell us, "No cause for alarm. Our ace scientists have studied this from every angle and nothing can go wrong." But in every generation of nuclear power, something *has* gone wrong. I won't list the nuclear accidents the world has endured, since you know them well. **Now you propose to transport dry casks – which are as safe where they are as they would be in Texas – across the roads and waterways of America.** What could go wrong? A LOT COULD GO WRONG. Although nobody believes the "interim" ruse, the actual plan is for this waste to be transported along roads, rails, rivers and coastlines *twice*: once on their way to temporary storage, and again on their (fictitiously assumed) route to "permanent storage".





From <https://www.nrc.gov/docs/ML2012/ML20121A016.pdf> accessed 8/4/2020

You're planning to stand these casks out in the desert like soda cans? **That's your plan?**

Not "Interim" At All

To call this program "interim storage" is a lie. **There is no permanent location** for nuclear waste, that will prevent contamination of the surrounding areas and eventually the world. The term implies that the DoE and industry are engaged in a rational process ending in safe, permanent storage. But no such thing exists, and after more than seven decades of nuclear power there's no "solution" in sight. **The environmental factor here is that the "interim" sites inadequately shield the waste from natural elements, human attack and the degradation of dry casks.** And they would likely remain there forever.

The moral factor is that this is a deliberate ruse: From 1987 to 2011 (24 years), Yucca Mountain was thoroughly studied, and found inadequate. Now, in only half a decade, the **NRC has rushed this "interim" storage plan through without adequate planning and study.** And the obvious motives for doing so are *despicable*.

Private Enterprise Cannot Be Trusted With This

What happened to Enron? How's Chesapeake Energy looking today? What about Barings Bank? J.C. Penny? **Companies that are profitable today will cease to be profitable later, and when that happens, they'll just disappear.** *Then* who guards the waste? Also, corruption is rife in industry, and how do we know none of this waste will be diverted to terrorists or foreign governments? Currently, nuclear power plants are well-watched. But out in the desert – *behind a cyclone fence?* – who would notice a missing cask? **By turning over nuclear waste to a for-profit company, you insure that the waste will be unguarded, just a few years after the company's profits sag.**

Full Cost Accounting

The companies who profited on the energy should pay for the waste they produce, even if it means guarding it for a million years. It's highly corrupt to allow private industry to profit from a dangerous process, and then give the deadly waste to taxpayers. **The environmental aspect of this point is that the taxpayers will not be able to afford continued maintenance, once the companies fold, for the length of time necessary, resulting in the eventual release and dissemination of the waste** around the Southwest and potentially around the world. Taxpayers cannot be expected to continue funding maintenance of a waste dump for ten thousand centuries, so it will not happen. The moral point is that government should not be assisting rich investors to profit off a dangerous technology, without assuming the risks and obligations inherent in nuclear waste.

A Nuclear Renaissance is Death to the Biosphere

Now we come to the core of my objection, which challenges your mandate as a federal agency: **nuclear waste is unquestionably the most horrible substance on Earth, and to encourage its production is the opposite of "environmentally friendly"**. We're burdened with a quarter million metric tons of nuclear waste, worldwide. Failure to properly guard this waste – for a million years or so – will result in it mixing with the soil and water, and getting into the bodies of humans, trees and deer, mutating them extravagantly and fatally. To even *consider* making more of this eternal, deadly nuclear waste is the most foolishly evil thing I can imagine. **If the point of EIS is to determine the potential environmental effect of a project, the death of the entire biosphere should be taken into account.** The release of nuclear radiation into the environment leads to cancers (for the exposed) and mutations in future generations. And by releasing power companies from responsibility for the horrific waste they produce, **you would insure a "nuclear renaissance", which would make even more waste**, while leaving what has already been produced (and profited on) sunbathing in Texas.

As this is an EIS review, it should be noted that **any potential failure to protect the people from nuclear radiation, now or in the future, should suffice to deny the EIS.** And everything I've written above shows that moving more than 80,000 metric tons of high-level nuclear waste across America's highways is potentially harmful; that no increased safety is added at the "interim" site; that the "interim" site is likely to become permanent, after insufficient study and inadequate precautions; that the waste will be horrifically dangerous for a million years, and the company will probably not last a century; nor will the current casks will be secure only for a century. **Stop making more waste** before you try to make it all "disappear".

Additionally, **you do not have legal authority to take possession of nuclear waste** if a permanent site is not available. But the illegality of this move is secondary to the **environmental threat**. This proposal opens the specter of horrific disaster in America.

If you approve this EIS you are ignoring the obvious. But remember, your motives are also obvious. **This is the most serious environmental issue on the planet**, and if you deal with it merely as a business proposition, you are failing the American people.

Very Sincerely,
Christopher Logan