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Holtec International HI-STORE Consolidated Interim Storage Facility Project

Comment On: NRC-2018-0052-0376

Holtec International HI-STORE Consolidated Interim Storage Facility Project

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General Comment

NRC-2018-0052 - Burlington Northern Santa Fe (BNSF) will be the railroad carrier for the Spent Nuclear Fuel to HI-STORE CISF in New Mexico

While rail transport is not part of this DEIS, it is very important to widen the discussion to include the safety of rail transport in the State of New Mexico as a side note of consideration.

New Mexico is part of the BNSF Southern Transcon, which runs from the ports in southern California to the Midwest. In New Mexico, it runs from Gallup to Clovis. BNSF owns 1,125 of route miles and has track rights to another 515 within our state. The Belen NM rail yard, just south of Albuquerque, is one of the busiest locations in the entire BNSF network in terms of trains per day.

About 9,000 carloads of New Mexico agriculture products and 8,000 carloads of consumer products are exported to other markets on BNSF railways. Another 73,900 carloads of industrial and energy products leave the state via BNSF. A total of 4.5 million carloads of freight move through New Mexico by BNSF annually.

BNSF has invested approximately \$555 million to expand and maintain its New Mexico network over the past five years, including \$80 million in 2019. That investment included a complete upgrade of the Clovis to Carlsbad/Loving track. Only the extended track east of Carlsbad to the CISF site is included in this DEIS.

There are several small communities and industries along the Clovis - Carlsbad rail line where O&G, basalt, farming, and other commercial products move in and out of New Mexico. In most communities, the railroads travels directly through the center of the town at very low speeds. These communities need to be well informed about the safety of the specialty trains that will transport the radioactive material.