

## **WCS\_CISFEISCEm Resource**

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**From:** Ned Flaherty <ned\_flaherty@msn.com>  
**Sent:** Wednesday, February 22, 2017 10:56 PM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC=2016-023: Extend Comment Period, Include Transport in EIS, Reject Centralized

Nuclear Regulatory Commission:

Waste Control Specialists' (WCS) application to store tons of irradiated nuclear fuel and high-level radioactive reactor waste in Andrews County will cause thousands of unnecessary nuclear waste shipments nationwide.

Your EIS (Environmental Impact Statement) must include: (1) risks of national transportation; (2) risks of the site becoming permanent; (3) transportation methods, (4) specific routes, and (5) all potential impacts.

I urge NRC to extend the EIS scope public comment period for 90 more days.

The WCS EIS must show transportation routes and the array of potential impacts from mishaps along those routes, which put deadly waste in communities, farmland, sensitive natural areas, and watersheds nationwide for 24 years.

Actual accidents often exceed the worst estimated impacts.

The WCS EIS must include: (1) national transportation routes to --- and FROM --- Andrews (since it will eventually depart); (2) all potential consequences; (3) routine radioactive emissions; and (4) potential impacts from mishaps.

The EIS should independently review the groundwater contamination risk at the site, because the entire Texas Commission on Environmental Quality TCEQ Radioactive Materials Division recommended banning "low-level" radioactive waste at the WCS site.

The EIS should consider: (1) potential impacts from mishaps (along transport routes and at the site) to people, land, and water; (2) radiation monitoring; (3) cumulative impacts of multiple facilities near WCS; (4) site security, (5) engineering adequacy of the storage pad and seismic stresses; and (6) adequacy of the waste removal crane.

The EIS should specify in detail the handling of radioactive waste from cracked/leaking canisters, since WCS has no wet pool or hot cell. There is no known method for transferring waste from dry cask to dry cask, so WCS must explain this now.

The EIS must review the multiple, additive, cumulative, and synergistic effects of radioactivity and hazardous waste on workers, residents, people susceptible to radiation, animals, plants, microbes, water, soil, etc. The EIS must clarify the physical impacts of hazardous materials on WCS's many sites and nearby facilities (including Urenco) upon people, animals, plants, etc.

Human exposure to high-level radioactive waste can lead to immediate death, so the public does not consent to becoming a national radioactive waste dumping ground. There is no need to risk contamination of our land, aquifers, air, or the health of plants, wildlife, and livestock.

Homeowners' insurance doesn't cover radioactive contamination, and just one rail car could contain as much plutonium as the bomb dropped on Nagasaki. Serious train accidents occur regularly now, including near the WCS site. Two trains collided head-on in West Texas last year at 65 mph, but casks were tested only up to 60 mph, so EIS must cover this.

The EIS should address "interim storage" gradually becoming dangerous permanent de facto disposal, with the waste never disposed of in a scientifically viable geologic repository using a reliable isolation system, and staying there forever.

The EIS should explain what happens when above-ground casks suffer from temperature extremes, wildfires, tornadoes, and earthquakes. When could waste turn critical? What interactions with other WCS radioactive waste and hazardous materials could occur? At this site and nearby sites, what are the cumulative impacts of waste on workers, local people, and the environment? How could natural disasters worsen the impacts?

There is no way to re-containerize waste, so the EIS must explain how WCS will do this both now, and forever more during the millions of years that the waste stays dangerous.

I urge you to extend the WCS EIS scoping public comment period by 90 more days so that communities along the routes and near the site can comment.

Please hold a public scoping meeting in every transport community, especially Dallas, San Antonio, Chicago, Charlotte, Atlanta.

Sincerely,

Ned Flaherty  
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