

WCS_CISFEISCEm Resource

From: Natalie Houghton <tallyho4617@hotmail.com>
Sent: Wednesday, February 22, 2017 6:54 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Docket ID NRC=2016-023: Extend Comment Period, Include Transport in EIS, Reject Centralized

To the Nuclear Regulatory Commission:

Waste Control Specialists' (WCS) application to store tons of irradiated nuclear fuel and high-level radioactive waste from nuclear reactors around the country in Andrews County will cause thousands of unnecessary nuclear waste shipments across the US.

Please make sure the Environmental Impact Statement (EIS) includes the risks of national transportation, as well as the risks of the site becoming permanent by default. Include transportation methods, specific routes, and all their potential impacts in the Environmental Impact Statement.

Extend the public comment period on the scoping of the Environmental Impact Statement for WCS application for 90 more days to enable parties along all likely routes to comment. Additional time is needed to alert those potentially impacted and for those already aware to provide meaningful input.

The Environmental Impact Statement (EIS) for Waste Control Specialists' license application should include a designation of transportation routes and the potential impacts of accidents or malicious attacks that could occur along those routes. If the license gets approved, deadly waste would be transported through communities, farmland, sensitive natural areas, and watersheds throughout the country for 24 years. Even one small accident could devastate a significant area and number of people. Despite assurances that accident damage would be minimal, some actual disasters have exceeded the worst anticipated scenarios.

The Environmental Impact Statement (EIS) for Waste Control Specialists' license application must include national transportation to and FROM Andrews, assuming that it will also leave some day. It should designate the routes and cover all potential consequences of transport, including the legally allowed routine radioactive emissions from transport and storage casks, and all potential impacts of accidents or attacks that could occur along said routes, including those passing through large cities.

The EIS needs to independently review the risk of groundwater contamination at the site, especially since the entire Texas Commission on Environmental Quality TCEQ Radioactive Materials Division recommended denying a license for "LOW-level" radioactive waste at the Waste Control Specialists site due to the proximity of groundwater.

The EIS should consider potential impacts from accidents or radioactive waste-related acts of malice along transport routes and at the site, including impacts to people, land and water. In-depth research should examine radiation monitoring and cumulative impacts of multiple facilities near the WCS site, site security, engineering adequacy of the storage pad and seismic stresses, and the adequacy of any crane that would move radioactive waste.

The report must include exactly how radioactive waste from a cracked and leaking canister would be handled, as it appears there would be no wet pool or hot cell at the WCS site. Apparently, no one knows yet how to transfer waste

from dry cask to dry cask. WCS should have to explain how this would be accomplished, not just say they'll figure it out when the problem arises.

Since there would be both hazardous and mixed waste at the WCS site, the EIS must review the multiple, additive, cumulative and synergistic effect of radioactivity and hazardous waste on workers, residents, people of all ages with varying susceptibilities to radiation, plus animals, plants, microbes, water, soil, etc. Please clarify the physical impacts of hazardous materials on WCS's many sites and nearby facilities (including Urenco) on people, animals, plants, etc.

Please know that we don't consent to becoming a national radioactive waste dumping ground. We should not have to risk contamination of our land, aquifers or air, or the health of plants, wildlife and livestock. Human exposure to high-level radioactive waste can lead to immediate death.

Homeowners' insurance doesn't cover radioactive contamination. A single rail car could haul waste containing as much plutonium as the bomb dropped on Nagasaki. There have been serious train accidents throughout the country in recent years, including near the WCS site. Two trains collided head-on in West Texas last year at 65 mph. I understand that cask testing has been conducted for accidents up to 60 mph, that crash shows that this scenario has already been exceeded. The EIS needs to address these risks.

The EIS should address the impacts of "interim storage" becoming dangerous permanent de facto disposal: the waste might never be disposed of in a scientifically viable geologic repository using a reliable isolation system. With political pressure gone, the waste would likely never move again.

Above-ground casks would be exposed to the weathering effects of temperature extremes, potential wildfires, tornados and earthquakes. The EIS should address these issues and answer the following questions: At what point could the waste go critical? What interactions of these circumstances and contact with other radioactive waste and hazardous materials at the WCS site could occur? Beyond the cumulative impacts of waste at this site and nearby sites on workers, local people and the environment, how could natural disasters add to those basic impacts?

Currently there is no way to re-containerize the waste if and when necessary. The EIS must analyze and explain how WCS will do this, now, and how they will guarantee it can be done in perpetuity. The EIS must cover the millions of years the waste will stay dangerous, considering the future since there is NO GUARANTEE in the license that the waste will ever leave.

Please extend the public comment period on the scoping of the Environmental Impact Statement for WCS's application for an additional 90 days. Communities along transport routes and those near the waste site need more time to have their questions answered, and the proper forum to provide their input.

Please hold public scoping meetings in Dallas, San Antonio, Chicago, Charlotte, Atlanta, and other transport corridor communities so that those who would be put at risk can address the NRC on this important issue.

Sincerely,

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