

# PUBLIC SUBMISSION

<b>As of:</b> 3/3/17 11:48 AM
<b>Received:</b> February 28, 2017
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 1k1-8uzz-ht1s
<b>Comments Due:</b> March 13, 2017
<b>Submission Type:</b> API

**Docket:** NRC-2016-0231

Waste Control Specialists LLC's Consolidated Interim Spent Fuel Storage Facility Project

**Comment On:** NRC-2016-0231-0005

Environmental Reviews: Waste Control Specialists, LLC; Consolidated Interim Spent Fuel Storage Facility Project

**Document:** NRC-2016-0231-DRAFT-0050

Comment on FR Doc # 2017-01966

72-1050

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**Government Agency Type:** Federal

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RULES OF PROCEDURE

## General Comment

Nuclear waste is again a hot issue for us. Waste Control Specialists (WCS) is a company in Andrews County in far West Texas. The company was founded by Texas billionaire Harold Simmons who donated millions to Rick Perry while WCS was being licensed. Mr. Simmons is now expired and WCS may be bought by a competitor, if anti-trust concerns are overlooked...WCS first promised to accept only chemical hazardous waste, then promised to accept only low level radioactive waste (LLRW) from nuclear power plants in Vermont and Texas, then other LLRW, and is now seeking high level radioactive waste (HLRW) from power plants throughout the country. This waste is primarily spent nuclear fuel rods.

These intensely radioactive materials are currently stored on site at the hundred or so nuclear plants in the US, four of which are in Texas. The Department of Energy (DOE) is looking for a consent based site for interim storage of this waste until a permanent storage repository can be developed. Read the Texas Tribune's report, Will Texas become final resting place for high-level nuclear waste?.

There are many reasons why Sierra Club believes interim storage, and storage in West Texas in particular are bad ideas. (Background resources can be found at No Nuclear Waste Aqui!). The nuclear power industry is

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F-RIDS = ADM-03  
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eager to offload their responsibility for storing this material. Once interim storage is created it could spur further nuclear power development sought by the industry. Once an interim storage site is created there will be little incentive (and less funds) for development of a permanent repository.

It is highly likely that interim will become de facto permanent, without providing the standards for long term (hundreds to thousands of years) safety and security required of a permanent repository. The storage site in West Texas (which I have toured) is only 2 miles from the town of Eunice, New Mexico and the area is subject to severe storms, heat, and even has earthquakes. The Ogalala aquifer, the largest in the US, is thought by some to be under this site.

Storage of HLRW in Andrews County would require transport of thousands of casks of this material, by train and/or truck, from sites all over the country. San Antonio is included in the major potential transport routes for this material. A potential accident and spill of this material could jeopardize the lives of thousands of citizens. A terrorist diversion/release is also a serious threat. And if a permanent repository ever is developed elsewhere, the transport of all this highly radioactive material would be required a second time.

On site storage within the secure confines of nuclear power plants has proven the safest interim storage solution and should be continued while efforts to develop a permanent repository should be redoubled (while taking measures to reduce and eliminate further HLRW production by building no new nuclear plants and gradually shutting down all existing plants).

WCS has a now complete application with the Nuclear Regulatory Commission. Comments on this are now being accepted, but only until Mar 13, 2017 11:59 PM ET. I urge all interested persons to write and oppose this application. Consent should include those potentially affected by all this transportation, and we in the San Antonio region do not consent.