

## Presentation to NRC

Good evening Mr. Chairman, members of the Commission, Ladies and Gentlemen.

My name is Ron Black. I am the chairman of the Lea County Commission. I am here tonight speaking on behalf of the Lea County Board of Commissioners and the citizens of Lea County

I want to thank you for being here tonight to gain insight into the viability of the application Waste Control Specialists has filed for the establishment of an interim Storage of Spent Nuclear Fuel facility in our area. Lea County has branded itself as the Energy Plex and we take great pride in the role we play in helping to make the United States self-sufficient in energy. We are one of the most prolific producers of oil and natural gas in the nation. We are also home to the nation's largest uranium enrichment facility, and we are rapidly expanding our footprint in renewable energy in the areas of wind energy, solar energy, and bio-fuels. We understand and support anything that contributes to the nation's energy supply. We also understand that a safe, well planned interim storage facility would be much better than the present system of storing the nuclear waste on site at the nation's power plants.

However, with thousands of square miles of virtually uninhabited land available in Southeast New Mexico and West Texas, it was a shock to me to discover that WCS has applied for a permit for the interim storage of nuclear waste in a location so near a populated area. I was also disappointed that I had to learn about this from the newspaper. Even though the proposed facility borders Lea County, WCS has never approached the county or offered any information about their plans to the county. It is imperative the NRC understands the significant number of individuals within an impact area, not just Andrews County residents, but all area residents.

Although the proposed facility will be located in Texas, the impact will be overwhelmingly on Lea County and the State of New Mexico. According to the map Mr. Cobb has distributed, 635 square miles of Andrews County falls within the 25 mile zone that would be most impacted in an accident. However, only 117 people live in this area. On the other hand, 950 square miles of Lea County would be impacted with a population in the impacted area of 48,283. 95.7% of the people impacted would be in Lea County and less than  $\frac{1}{4}$  of one percent would live in Andrews County.

The closest population center in Andrews County to the site is the city of Andrews which is approximately 35 miles to the southeast. In Lea County, the city of Eunice is only 4 miles from the proposed site while the major population center in the area, Hobbs, is only 20 miles from the proposed site.

From looking at the map, it is obvious that, in the event of an accident, the first responders would have to come from Lea County and the cities of Eunice and Hobbs. As the chair of the Lea County Commission, I am concerned about the additional financial burden this would place on our county. We would have to have additional hazmat personnel, equipment, and training.

It seems obvious to me that all of the benefits of this project would accrue to Andrews County while at the same time Andrews County would have little of the responsibility. On the other hand Lea County would receive no benefit, but would be faced with most of the responsibility.

While I am not qualified to talk about the science of the project, several concerns have been raised about the technical aspects of the storage system that WCS is proposing. On a project of this nature there is no margin for error and there should be 100% assurance that the project will operate as advertised. The technical questions raised as to the system that WCS proposes to use have certainly created doubts in my mind as to the safety of the project as proposed.

Another concern I have regards the quality of construction at the site. I have recently read several newspaper articles that discussed a number of quality control issues with Areva's equipment construction. Just last Tuesday, the Wall Street Journal had an article in which it discussed the problems that French regulators are having with Areva. Even more disturbing, the article indicated that many of the problems had been covered up and information falsified. Reuters, in a similar article, recently stated that French authorities have opened an investigation into decades of alleged forgery relating to the quality of parts produced by the company and used around the world. In a project of this nature, cutting corners and playing fast and loose with the facts, should not be an option. With Areva being WCS's primary partner on the project, these articles raise even more safety concerns for the citizens of Lea County.

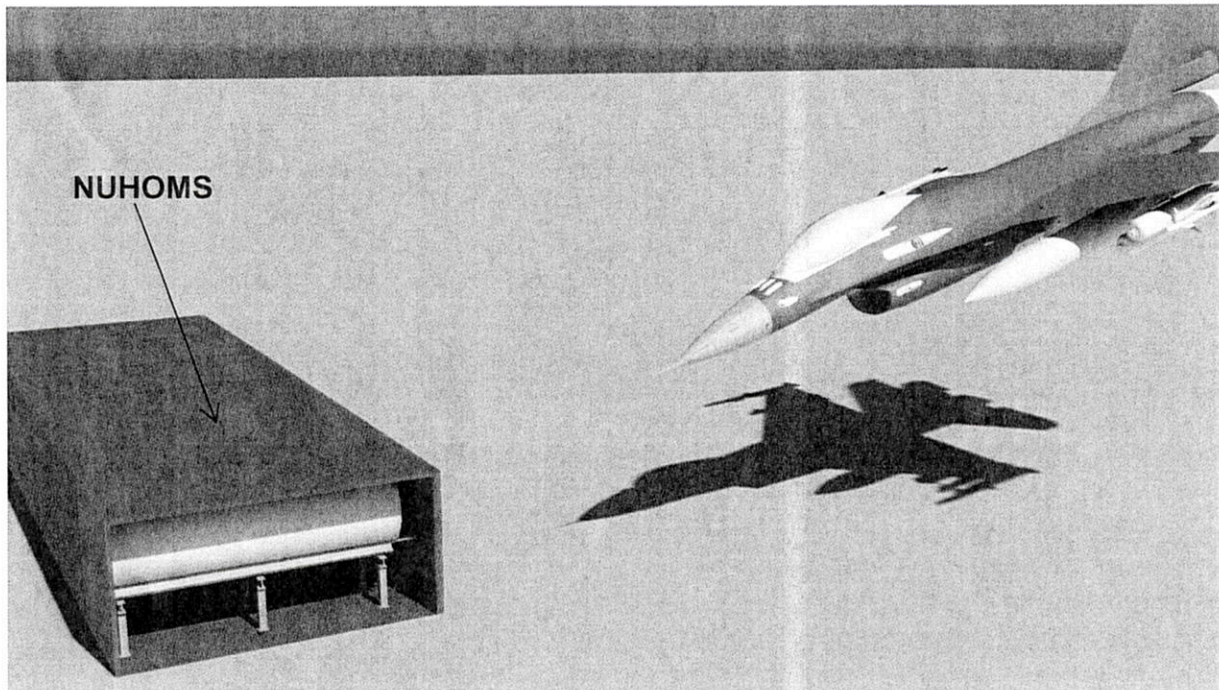
I can sum up my testimony by stating that Lea County recognizes the need for an interim storage facility. However, we feel that the site that WCS is promoting is not a viable site and would put the citizens of Lea County at risk, as well as creating a financial hardship on the county for preparedness plans, equipment, and training without any guaranteed income from the project.

## Fact Sheet

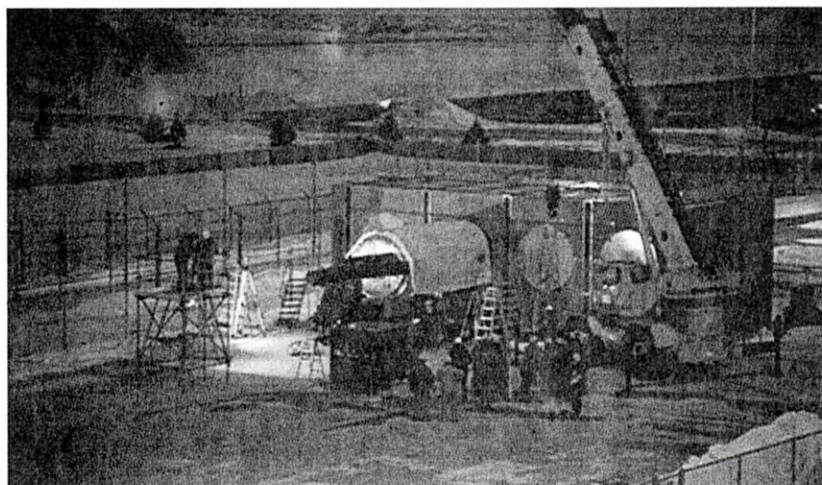
1. The canister loaded with over 10 million curies of radioactivity is housed inside the flat concrete walls that AREVA calls NUHOMS.

Thousands of these NUHOMS houses for the nuclear fuel will be erected by WCS at New Mexico's border with Texas.

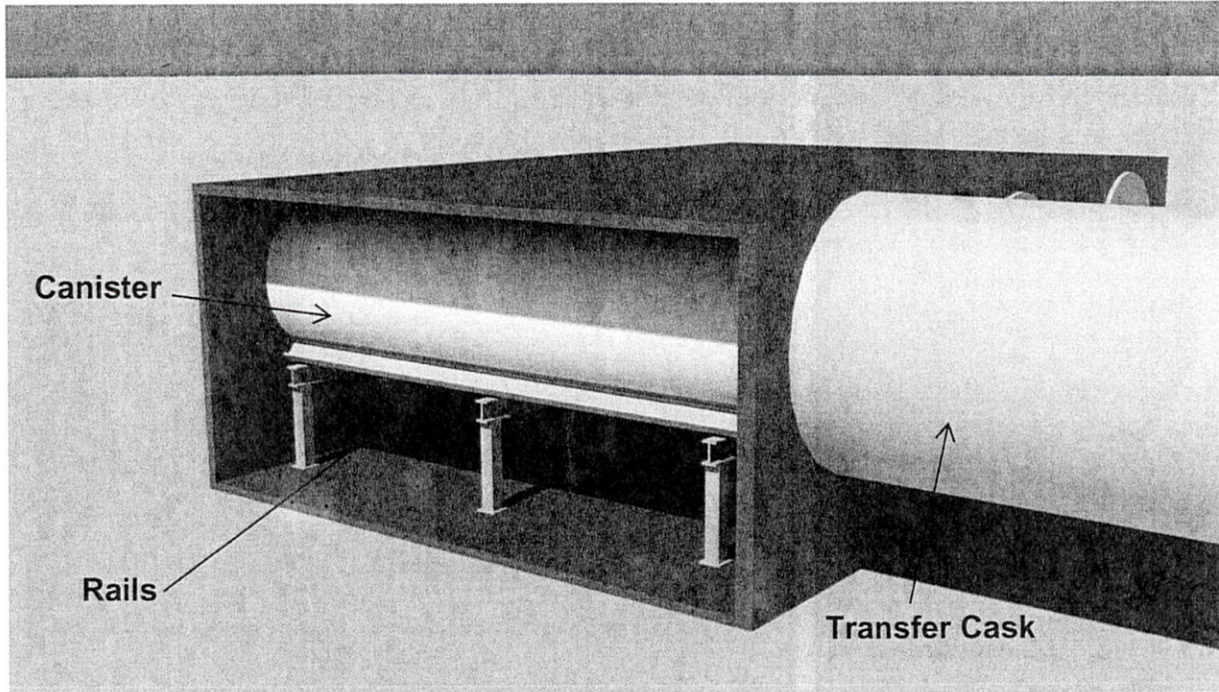
These concrete walls are a huge target to a crashing air craft. The result of the crash will be an environmental nightmare for Eunice, Hobbs and our other communities.



2. Each Canister is a thin walled container weighing over 40 tons. How does Areva install the 40 ton Canister in the NUHOMS houses? By pushing it over a set of rails.

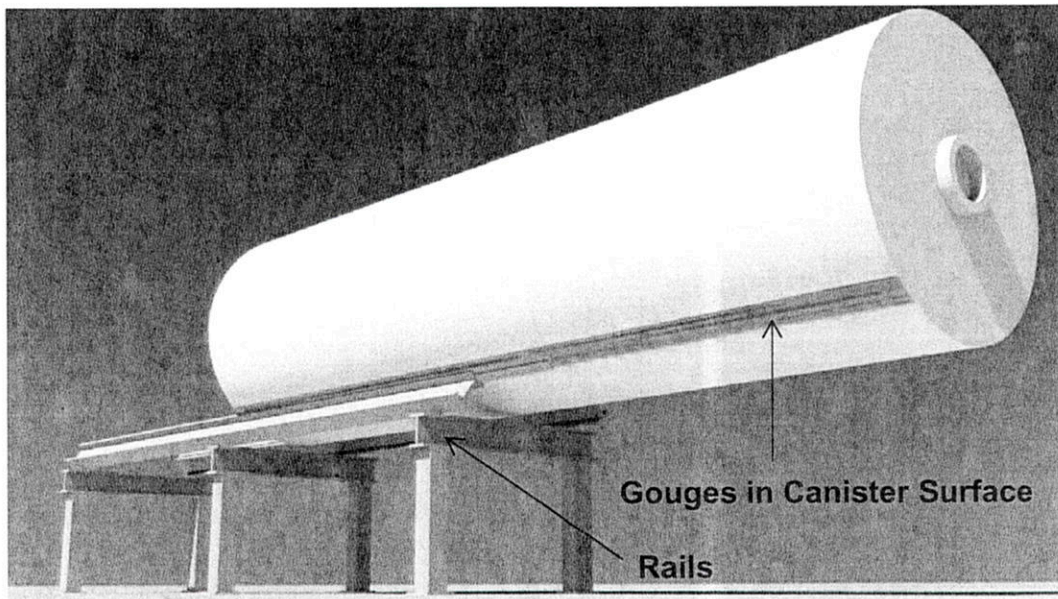


## Fact Sheet



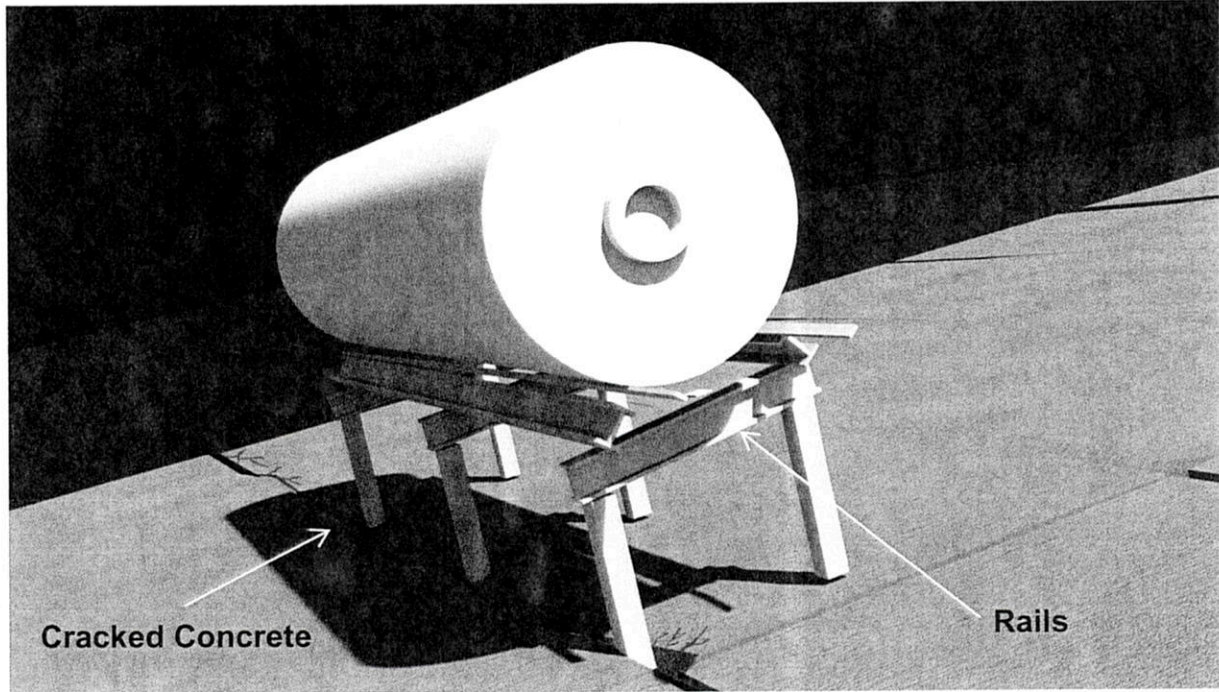
Most every canister surface is gouged as it is pushed even with grease applied on the rails. It will be damaged even more severely again when it is pulled out of storage after the grease has dried up over time by the high radiation...and then again when it is pushed into the NUHOMS module at WCS. A thin walled Canister, gouged again and again, every time it is handled! Can the NRC assure us that none of the thousands of canisters that will be stored at the WCS site will leak?

What will one or more leaky canisters do to our environment?



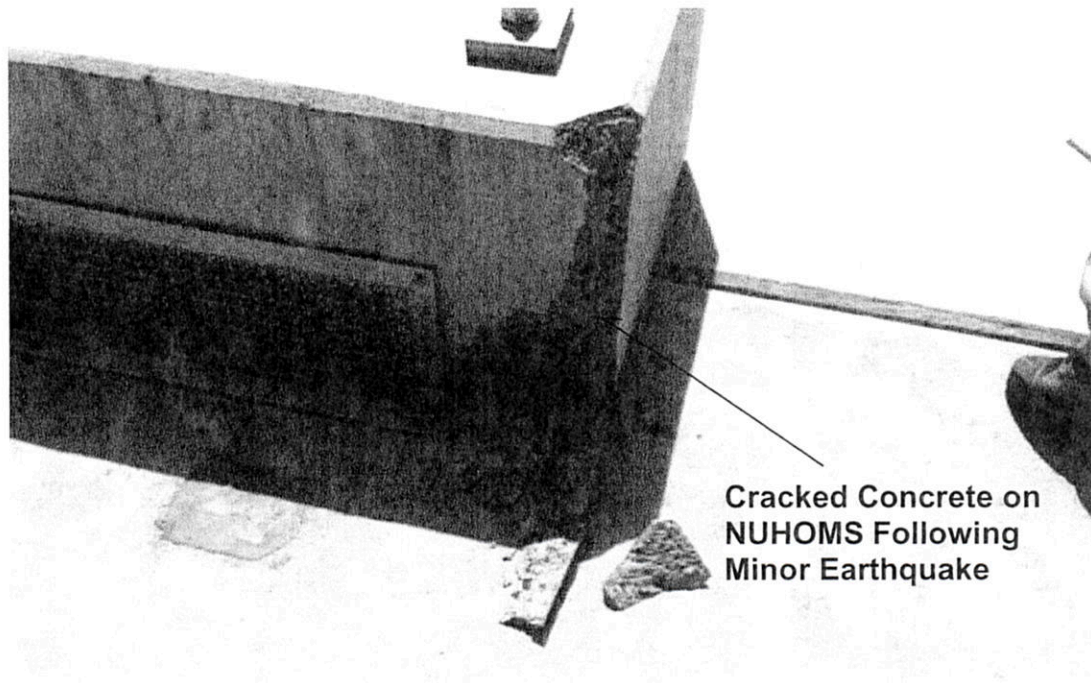
## Fact Sheet

3. WCS calls it Interim storage....what will happen if the slab supporting the support legs that hold the rails settle after years of storage? How will the Canister be dragged out of the NUHOMS if the rails holding the Canister start to deform? Does WCS have a practical recovery plan if the canister cannot be removed? Will the site become a permanent dump?

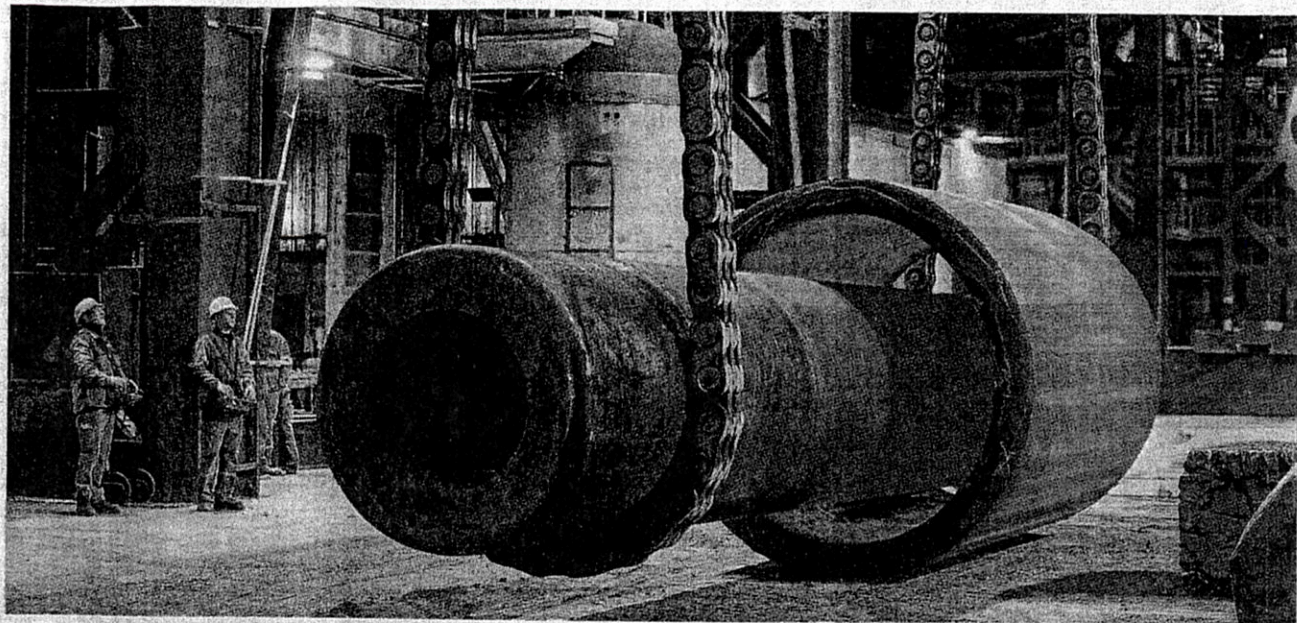


## Fact Sheet

4. We understand a slight earthquake caused damage to the NUHOMS at a Virginia plant in 2011. What will happen if a stronger earthquake strikes? Will the joints at the concrete wall and roof remain intact? Will the rails fail? Will our communities be faced with exposure to deadly radiation?



BUSINESS NEWS



ROBERT PRATT/REUTERS

Inside Areva's Le Creusot Forge factory in France. Inspectors said that quality control remains a problem at the manufacturing plant.

# Nuclear Supplier Hit Over Safety

By MATTHEW DALTON

PARIS—A team of international inspectors described extensive management weaknesses at a supplier for the global nuclear-power industry, finding that safety failings are still a worry months after investigators revealed a decadeslong coverup of manufacturing problems at a French factory owned by the supplier.

In a letter sent to the supplier, **Areva SA**, late last month, the inspectors said the French company had neither analyzed why the coverup had gone undetected for years, nor could guarantee that similar

problems wouldn't recur.

They also identified a recent instance in which manufacturing records at the factory, Le Creusot Forge in central France, had been haphazardly altered, suggesting that quality control at the plant remains a problem.

"You cannot prove that the current level of quality culture and nuclear safety at Creusot Forge is acceptable," according to the letter from the French Nuclear Safety Authority, which led the group of international inspectors.

Areva said it would respond "comprehensively" to the remarks from the inspectors.

"This is in line with our plan to restore and improve quality at Le Creusot site as part of the quality audit being carried out currently," said David Emond, a senior executive at Areva.

The findings underscore the problems at Le Creusot, one of the world's crucial production sites for nuclear-power components.

French investigators last year discovered that the plant had been concealing manufacturing problems from its customers and regulators for decades, as it sold parts to nuclear-power plants worldwide.

The coverup has shaken public trust in the nuclear industry and unsettled regulators in Europe, North America and Asia. The manufacturing flaws concealed by employees at Le Creusot led regulators to shut down reactors at two French nuclear plants over the summer.

After discovering those flaws, the French regulator ordered Areva to conduct an expanded review, covering every part manufactured at Le Creusot since the 1960s.

Areva executives and regulators say investigators have already found hundreds of irregularities in these files.

bed

ood-service  
ticken con-  
d the com-  
ach other's  
ing excess  
o Mexico to

ing Tyson,  
and Sand-  
ve rejected  
id plan to  
A Pilgrim's  
id Monday  
t received a  
na.

major U.S.  
have also

er the way  
amid scru-  
used pric-  
ed by the  
it of Agri-  
a Dock in-  
ated using  
en compa-  
ged higher  
chmarks.  
t U.S. meat  
closed the  
n Monday  
profit fore-  
ow prices  
l for beef  
son's quar-  
%, a record

ported net  
illion, or  
ared with  
15 a share,  
iod.

Jamerson  
is article.

# g Yen Slices Into Toyota's Latest Earnings

Motor  
rp decline  
spite sell-  
stronger  
ated earn-

ighlighted  
ustry's de-  
exchange  
President  
ised when

criticizing Japan. Toyota's profit took a hit for most of 2016 when the yen was stronger against the dollar, but the company on Monday raised its profit forecast for the year ending in March after the yen's recent weakening.

Mr. Trump has targeted Japanese car makers for driving a trade imbalance with the U.S. that he says is unfair. The White House is considering a 20% import tax on products

from countries with which the U.S. has a trade deficit.

Toyota President Akio Toyoda met with Japanese Prime Minister Shinzo Abe on Friday ahead of the Japanese leader's meeting with Mr. Trump this week. The two declined to say what was discussed.

Tariffs on imports could upend Toyota's business, despite its manufacturing base in

U.S. "We are very close to full capacity [in our U.S. plants] at the moment," said Toyota Managing Officer Tetsuya Otake. Adding more factories would be expensive and might take years to put in place.

Toyota is building a \$1 billion plant for Corolla sedans in Mexico. Mr. Trump's threats of a "substantial tax" on imported cars also put pressure

ing a large production base in Japan, Toyota says.

The company on Monday posted a 23% decline in profit to ¥486.53 billion (\$4.35 billion) for the December quarter. Toyota raised its full-year profit outlook to ¥1.7 trillion yen from ¥1.55 trillion yen. Toyota has struggled to maintain sales growth in the U.S. as low gas prices make trucks and sport