

As of: 3/14/17 4:56 PM  
Received: March 10, 2017  
Status: Pending\_Post  
Tracking No. 1k1-8v6f-qvrm  
Comments Due: April 28, 2017  
Submission Type: Web

# PUBLIC SUBMISSION

**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-0077  
Comment on FR Doc # 2017-01966

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## Submitter Information

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## General Comment

Dear Members of the Nuclear Regulatory Commission:

I am writing in regards to Docket ID NRC-2016-0231, Waste Control Specialists, LLC; Consolidated Interim Spent Fuel Storage Facility Project, near Andrews, Texas.

As a resident of the region, I am very concerned about the company's poor record of safety. For example, a 22-ton shipment of low-level radioactive material from a diffusion plant in Illinois failed to arrive at the WCS Andrews facility in late July 2001. It remained "lost" for almost a month until the material turned up dumped on a cattle ranch north of Dallas.

The company was also fined several times in 2004 was 2005 for a string of incidents, including when an employee improperly released radioactive material by flushing it down a toilet.

I also question the "interim" nature of this project. With no final destination for this spent fuel, we in the region are facing a growing problem that is unlikely to be resolved in our lifetimes.

On top of that, Texas state agencies have been lax in regulating this facility. The state of Texas maintains that the WCS facility does not sit above or adjacent to any underground drinking water formations even though

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Template = ADM-013

E-ADS = ADM-03  
Add = J. Park (JRP)

water is present at 800-1,000 feet below the surface. Our great state has a dubious way of regulating water, claiming that brackish water should not be subject to the same level of protection as potable water. In West Texas, which is the most water-stressed region in our state, just about everybody knows that brackish water can be treated and used for a variety of purposes from irrigation to watering livestock to residential uses like washing and showering. This water is going to be necessary in a drought that people in wetter parts of the state (like the capital) are incapable of even imagining today.

The Nuclear Regulatory Commission is our final hope for putting a stop to this ill-conceived project.

I respectfully request that you use your authority to block Docket ID NRC-2016-0231 because:

- The company does not deserve to see its permit expanded based on its poor safety record
- The fuel is likely to remain at the facility for many decades beyond what is currently envisioned and
- The indefinite storage of high-level nuclear waste increases the possibility that the facility could leak radioactive waste into the groundwater, contaminating a resource that we can't afford to waste out here in the desert.

Thank you for your attention.

Respectfully yours,  
C. Arthur "Trey" Gerfers, III  
Marfa, Texas

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## Attachments

Docket ID NRC-2016-0231\_comment by C. Arthur Gerfers III

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I am writing in regards to Docket ID NRC-2016-0231, Waste Control Specialists, LLC; Consolidated Interim Spent Fuel Storage Facility Project, near Andrews, Texas.

As a resident of the region, I am very concerned about the company's poor record of safety. For example, a 22-ton shipment of low-level radioactive material from a diffusion plant in Illinois failed to arrive at the WCS Andrews facility in late July 2001. It remained "lost" for almost a month until the material turned up dumped on a cattle ranch north of Dallas.

The company was also fined several times in 2004 was 2005 for a string of incidents, including when an employee improperly released radioactive material by flushing it down a toilet.

I also question the "interim" nature of this project. With no final destination for this spent fuel, we in the region are facing a growing problem that is unlikely to be resolved in our lifetimes.

On top of that, Texas state agencies have been lax in regulating this facility. The state of Texas maintains that the WCS facility does not sit above or adjacent to any underground drinking water formations even though water is present at 800-1,000 feet below the surface. Our great state has a dubious way of regulating water, claiming that brackish water should not be subject to the same level of protection as potable water. In West Texas, which is the most water-stressed region in our state, just about everybody knows that brackish water can be treated and used for a variety of purposes from irrigation to watering livestock to residential uses like washing and showering. This water is going to be necessary in a drought that people in wetter parts of the state (like the capital) are incapable of even imagining today.

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Respectfully yours,

C. Arthur Gelfers, III  
PO Box 1253  
Marfa, Texas 79843