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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

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General Comment

WCS_CISF_EIS@nrc.gov

Subject: Docket ID NRC-2016-0231-0001

March 12, 2017

Gentlemen:

I am writing as a citizen highly concerned about the application before the Nuclear Regulatory Commission by Waste Control Specialists (WCS) for a license to construct and operate a "centralized interim storage facility" for highly radioactive commercial irradiated nuclear fuel (HLRW) in West Texas. Its plan to receive up to 40,000 metric tons of the deadly, cancer-causing HLRW (more than half of what exists in the U.S.) and "temporarily" store it on concrete pads at its existing nuclear and hazardous waste facility is most unsound.

There are numerous reasons why the NRC should not allow this application to proceed further and the following are just a few of the most prominent:

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This de facto permanent "parking lot" dump would launch 4,000 high-risk rail shipments that would travel from nuclear reactors nationwide through most states, posing dangerous risks to millions in towns and cities along the way to the West Texas destination. Such a massive movement of intensely radioactive waste moving day and night through major cities, towns and farm lands would amount to "dirty bombs on wheels" and create security risks of huge proportions, not to mention the almost unfathomable safety risks to humans, animals and all environments within great distances.

Many of these shipments would initially travel by barge on surface waters of our lakes, rivers and seacoasts to reach the nearest rail access, most of which provide drinking water to tens of millions of people.

The site for these shipments in the "host" county (Andrews) in Texas and the nearby area of Eunice, New Mexico, only four miles from WCS, is adjacent to large populations of Latin American and many low income residents already surrounded by high-hazard nuclear and fossil fuel industries. The U.S. already has a disgraceful record of placing the most hazardous and deadly materials in marginalized communities. A thorough Environmental Justice review must be a mandatory element of any Environmental Impact Statement before this or similar projects are allowed to proceed.

A mile-long rail spur is needed to be constructed to receive the estimated 3,000 cannisters of waste. Many questions remain to be addressed related to costs, ownership, liability, and future maintenance associated with that single-use preparatory project alone in addition to the many impacts on local, state and Federal agencies affected with the overall massive project.

Many serious threats posed by wide fluctuations of temperature, frequent tornadoes and other serious weather occurrences, and extremes of wet and dry climate pressures make the site a dangerous repository for materials that require utmost stable and isolated environments.

In addition to transporting this deadly material in/over waters en route to WCS, the proximity of the site to the Ogallala Aquifer and others that supply vital drinking and irrigation water to numerous breadbasket states in the region should, alone, be a disqualifying reason to reject the plan.

Hazardous and radioactive wastes are already stored on the WCS property and could severely impact the high level waste and its containers. There is no place or technology for re-containerizing damaged, leaking or cracked containers. Opening an unnecessary high level waste "parking lot dump" would launch unprecedented numbers of irradiated nuclear fuel shipments through many states.

That public scoping meetings have not been held in cities and communities along potential transport routes prior to further action on this request is a serious omission that undermines the public trust, but also sets an unnecessary and dangerous precedent for launching future shipments of radioactive waste for "temporary" storage. What will WCS do when the storage containers leak and break down or other safety threats occur? Will the material be relocated to another location?

Clearly, the NRC must address these and countless other issues in an expanded scoping process that includes people in areas along the proposed routes (which currently have no knowledge of this plan), conduct many more additional public meetings and extend the public intervention and contention times for an additional four months.

Your serious consideration of these comments is appreciated.

Ethyl M. Rivera

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