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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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Submitter Information

Name: Anonymous Anonymous

Address: United States,

Email: tdover3@aol.com

General Comment

Thank you for the opportunity to comment on the environmental review scope for WCS's request to store high level radioactive waste in my state.

As an executive with extensive experience in risk analysis, I am deeply concerned about the long-term environmental and safety implications of this proposal. WCS proposes dry cask storage, the same storage mechanism being used in most cases already. Therefore, this proposal does nothing to reduce risk related to storage. However, in almost every other aspect it creates or increases risk, and therefore should not be approved.

These risks include:

1. Transportation. Under the proposal a large amount of nuclear material will move across the country, including through major population centers. Since the proposal is for interim storage only, transportation will be required again to relocate the material to permanent storage. The WCS proposal magnifies the risk associated with transportation by requiring that all material be relocated twice. In addition, since it is possible that more than one long-term storage facility will be optimal, transit distances could be far less if material is moved directly to long-term storage, rather than moving first to an interim site and then to permanent storage.
2. Lack of Oversight. Currently, Texas provides oversight for the existing low level radioactive waste disposal facility in Andrews through the LLRWD Commission. While the Commission appears to provide effective oversight for issues related to low level material, high level waste is explicitly excluded from their scope. To

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my knowledge, there has been no similar oversight mechanism proposed for high level radioactive waste.

3. Public opposition. To date this proposal has received very little attention in Texas, and in my experience few Texans are currently aware of it. However, if it is approved and action begins to occur, public opposition could prevent WCS or its customers from moving material through Texas. Opposition forced discontinuance of the Yucca Mountain proposal, and visibility of the Andrews proposal is likely to generate similar opposition.

4. Corporate stability. WCS is in the process of being acquired by EnergySolutions. NRC should verify that this or any future change of control or ownership does not affect WCS's responsibility regarding safety and environmental protection during the term of the agreement.

5. No long-term solution. The WCS proposal is for interim storage. However, no plans exist for long-term storage. This creates the risk that the "interim" solution will become long term. At a minimum, an interim solution should not be implemented before a long-term solution has been agreed to.

6. Security. Storing large amounts of high level radioactive waste on the surface creates a significant risk of terrorism or other actions that could release nuclear waste into the atmosphere.

7. Water. The site appears to be located over the Ogallala and potentially other aquifers. While this has been contested by WCS, maps indicate the facility is over the Ogallala (see for example https://en.wikipedia.org/wiki/File:Ogallala_Aquifer_map.png), and Forbes has reported on this also (<https://www.forbes.com/sites/christopherhelman/2011/04/01/texas-billionaire-builds-giant-nuclear-waste-dump/#559f2c1b639f>).

8. Earthquake risk. The Andrews facility is located in an area of extensive fracking activity (See for example http://www.drillingmaps.com/Texas.html#.WMcNVm_yupp, which indicates fracking in Andrews County by several companies, including XTO Energy and Exxon Mobil).

In summary, the WCS proposal significantly increases risks relative to the "no-action" alternative.

Thank you.