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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

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General Comment

The Council on Environmental Quality's regulations (40 CFR 1500-1508) for NEPA define cumulative impacts as: "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions (40 CFR 1508.7).

There are a considerable number of nuclear-related facilities in the region of the licensee applicants including the URENCO facility near Eunice, WIPP, and a possible proposed interim SNF storage facility (Holtec) in Lea County, NM. Given that these facilities have past, present, and reasonable foreseeable future impacts, the cumulative impacts of the proposed federal action should be assessed. Hence, I request that the Environmental Impact Statement prepared for this license review include an assessment of cumulative impacts from these facilities onto current and future populations.

The EIS should examine all impacts associated with this federal action, including hazards and risks that are specific to the interim storage facility at Andrews, TX, the human environment along the transportation corridors from each of the nuclear power stations where SNF will originate from, as well as impacts at each of the source nuclear power stations. At the nuclear power stations (or decommissioned and closed sites like Trojan or Rowe), the EIS should consider impacts such as:
Regional and local economic effects of removal of the SNF
Environmental, health, and safety hazards associated with removing the SNF from the dry casks and loading it onto trucks

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
Add= J. Park (JRP) J. Quintero

(Jmm)

I am concerned about how WCS will decide which communities will be permitted to send SNF to WCS and it seems to me that this process has the potential to create dangerous impacts. Given the limited capacity of the proposed facility and the comparably large amount of SNF at reactor sites across the country, the EIS should examine the impacts that decisions of the operator, WCS, to accept waste from some sites and not from others will have on those communities. I am very much concerned that sites which are desperate to have their SNF removed (like Trojan) could be impacted in a very disadvantageous way if they are not selected as a client of WCS.

At each intermodal transport unloading and reloading sites, the EIS needs to examine the hazards and risks associated with planned operations (e.g. unloading from truck to train. The EIS should examine community emergency response readiness planning at each site where SNF containers are handled.

Each source location and transportation corridor is different and the EIS needs to appraise impacts at each site that might source SNF to WCS.

Given the bilingual nature of the regional population, the EIS and all public meetings should be prepared in Spanish and in English.