

## **WCS\_CISFEISCEm Resource**

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**From:** Alison Duncan <alison@duncandesign.org>  
**Sent:** Monday, February 27, 2017 10:56 AM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC=2016-023

To the Nuclear Regulatory Commission:

Waste Control Specialists' (WCS) application to store tons of irradiated nuclear fuel and high-level radioactive waste from nuclear reactors around the country in Andrews County, Texas, will cause thousands of unnecessary nuclear waste shipments across the US.

Risks of Transporting Nuclear Waste:

As you prepare an Environmental Impact Statement (EIS) of WCS's nuclear waste storage application, I urge you to include the risks of transporting toxic waste on our country's highways, railways and waterways.

The EIS for Waste Control Specialists' license application should include a designation of transportation routes and the array of potential impacts of accidents or malicious attacks that could occur along those routes. If the license is approved, deadly waste would be transported through communities, farmland, sensitive natural areas and watersheds throughout the country for 24 years.

The public comment period should be extended for 90 more days to enable parties along all these potential routes to comment.

Risks to Local Groundwater:

The EIS should independently review the risk of groundwater contamination at the site, especially since the entire Texas Commission on Environmental Quality Radioactive Materials Division recommended denying a license for "low-level" radioactive waste at the Waste Control Specialists site due to the proximity of groundwater.

Risks of Accident:

The EIS should consider potential impacts from accidents or radioactive waste-related acts of malice along transport routes and at the site, including impacts to people, land and water. In-depth research should examine radiation monitoring and cumulative impacts of multiple facilities near the WCS site, site security, engineering adequacy of the storage pad and seismic stresses, and the adequacy of the crane that would move radioactive waste.

Local Community Does Not Consent:

The local community has not consented to becoming a national radioactive waste dumping ground. They should not have to risk contamination of our land, aquifers or air or the health of plants, wildlife and livestock.

Risks of Temporary Site Becoming Permanent:

The EIS should address the impacts of “interim storage” becoming dangerous permanent de facto disposal, and the possibility that the waste might never be disposed of in a scientifically viable geologic repository using a reliable isolation system. With political pressure gone, the waste would likely never move again.

These risks - when included in your review – make the decision to reject WCSs application clear.

Sincerely,

Alison Duncan

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**Federal Register Notice:** 81FR79531  
**Comment Number:** 12514

**Mail Envelope Properties** (1995691695.35146.1488210986894.JavaMail.tomcat)

**Subject:** [External\_Sender] Docket ID NRC=2016-023  
**Sent Date:** 2/27/2017 10:56:26 AM  
**Received Date:** 2/27/2017 10:56:29 AM  
**From:** Alison Duncan

**Created By:** alison@duncandesign.org

**Recipients:**

**Post Office:** vweb205

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	2682	2/27/2017 10:56:29 AM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**