WCS_CISFEISCEm Resource

From: Tal Kinnersly <tal@kinnersly.com>
Sent: Monday, March 06, 2017 10:46 AM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Docket ID NRC=2016-023: Extend Comment Period, Include Transport in EIS, Reject Centralized

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 will cause thousands of unnecessary nuclear waste shipment across the US.

Please ensure the Environmental Impact Statement (EIS) includes the risks of national transportation as well as the risks of the site becoming permanent by default. Include transportation methods, specific routes, and all their potential impacts in the Environmental Impact Statement.

Extend the public comment period on the scoping of the Environmental Impact Statement for WCS application for 90 more days to enable parties along all potential routes to comment. Additional time is needed to alert those potentially impacted and for those already aware to provide meaningful input.

The Environmental Impact Statement (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 gets approved, deadly waste would be transported through communities, farmland, sensitive natural areas, and watersheds throughout the country for 24 years. Even one small accident would be one too many. Despite assurances that accident damage would be minimal, real life disasters have been known to exceed the worst anticipated scenarios.

The Environmental Impact Statement (EIS) for Waste Control Specialists' license application must include national transportation to and FROM Andrews since it will allegedly leave some day. It should designate the routes and cover all potential consequences of transport, including the legally allowed routine radioactive emissions from transport and storage casks and the array of potential impacts of accidents or attacks that could occur along those routes.

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

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, the adequacy of the crane that would move radioactive waste.

The report should include exactly how radioactive waste from a cracked and leaking canister would be handled, as it appears there would be no wet pool or hot cell at the WCS site. It appears that no one knows yet how to transfer waste from dry cask to dry cask. WCS should have to explain how this would be accomplished and not just say they'll figure it out when the problem arises.

Since there is hazardous and mixed waste at the WCS site, the EIS must review the multiple, additive, cumulative and synergistic effect of radioactivity and hazardous waste on workers, residents, people of all ages with varying susceptibilities to radiation, animals, plants, microbes, water, soil, etc. Please clarify the physical impacts of hazardous materials on WCS's many sites and nearby facilities (including Urenco) on people, animals, plants, etc.

Please know that we don't consent to becoming a national radioactive waste dumping ground. We should not have to risk contamination of our land, aquifers or air or the health of plants, wildlife and livestock. Human exposure to high-level radioactive waste can lead to immediate death.

Homeowners' insurance doesn't cover radioactive contamination. A single rail car could haul waste containing as much plutonium as the bomb dropped on Nagasaki. There have been serious train accidents throughout the country in recent years, including near the WCS site. Two trains have collided head-on in West Texas last year at 65 mph. I understand that cask testing has been conducted for accidents up to 60 mph, but this scenario has already been exceeded. The EIS should address these risks.

The EIS should address the impacts of "interim storage" becoming dangerous permanent de facto disposal, and 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.

Above-ground casks would be exposed to the weathering effects of temperature extremes, and potential wildfires, tornadoes and earthquakes. The EIS should address these issues and answer the following questions: At what point could the waste go critical? What interactions of these circumstances and contact with other radioactive waste and hazardous materials at the WCS site could occur? What are the cumulative impacts of waste at this site and nearby sites on workers, local people and the environment, and how could natural disasters impact add to impacts?

Currently there is no way to re-containerize the waste if and when needed. The EIS must analyze and explain how WCS will do this now and how they will guarantee it can be done in perpetuity. The EIS must cover the millions of years the waste will stay dangerous--consider the future as there is NO GUARANTEE in the license that the waste will ever leave.

Please extend the public comment period on the scoping of the Environmental Impact Statement for WCS's application 90 more days. Communities along transport routes and those near the waste site need to time to have their questions answered and the proper forum to provide their input.

Please hold public scoping meetings in Dallas, San Antonio, Chicago, Charlotte, Atlanta, and other transport corridor communities so that those of would be put at risk can address the NRC on this important issue.

Sincerely,

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