

## **WCS\_CISFEISCEm Resource**

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**From:** Ned Flaherty <ned\_flaherty@msn.com>  
**Sent:** Monday, March 06, 2017 6:16 PM  
**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:

WCS wants to store tons of irradiated nuclear fuel and high-level radioactive nuclear waste in Andrews County, which will cause thousands of unnecessary nuclear waste shipment nationwide.

The EIS should include: (1) the risks of national transportation; (2) the risks of the site becoming permanent; (3) transportation methods, (4) specific routes, and (5) all potential impacts.

The scoping public comment period should be extended 90 more days.

The EIS should designate transportation routes and the array of potential impacts of accidents or malicious attacks along routes in communities, farmland, sensitive natural areas, and watersheds over the next 24 years.

The history of actual disasters proves that mishaps often exceed the worst scenarios estimated.

The WCS EIS must include national transportation to and FROM Andrews, because it will eventually depart. The EIS should designate routes, all potential consequences, the routine radioactive emissions from transport and storage casks, and the array of potential mishaps along the routes.

The EIS should independently review the risk of groundwater contamination, especially since the entire Texas Commission on Environmental Quality TCEQ Radioactive Materials Division recommended denying a license for “low-level” radioactive waste at the WCS site because of nearby groundwater.

The EIS should consider: (1) potential impacts from accidents or malice along transport routes and at the site; (2) impacts to people, land, and water; (3) radiation monitoring; (4) cumulative impacts of multiple facilities near the WCS site; (5) site security; (6) engineering adequacy of the storage pad; (7) seismic stresses; and (8) adequacy of the crane for moving waste.

The report should include exactly how radioactive waste from a cracked / leaking canister would be handled, because the WCS site has no wet pool or hot cell. No one knows how to transfer waste from dry cask to dry cask, so WCS must explain exactly how that would work.

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, susceptible people, animals, plants, microbes, water, soil, etc.

No one wants a national radioactive waste dumping ground, or the risk of contamination to land, aquifers, air, or the health of plants, wildlife, and livestock. Humans exposed to high-level radioactive waste can die immediately.

Homeowners' insurance doesn't cover radioactive contamination. Just one rail car could leak as much plutonium as the Nagasaki bomb. The nation has suffered serious train accidents in recent years, even near the WCS site: two trains collided head-on in West Texas last year at 65 mph.

The EIS must address the impacts of "interim storage" becoming permanent de facto disposal, with the waste never disposed of in a scientifically viable geologic repository using a reliable isolation system.

Above-ground casks would suffer weathering effects, temperature extremes, wildfires, tornadoes, and earthquakes, so the EIS should explain: 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 the WCS site and nearby sites on workers, local people, and the environment? How could natural disasters worsen the impacts?

There is no way to re-containerize waste, so the EIS must explain how WCS will guarantee to do this for millions of years (since the waste will never leave).

Please extend the WCS EIS scoping public comment period for 90 more days.

Please hold public scoping meetings in Dallas, San Antonio, Chicago, Charlotte, Atlanta, and other transport corridor communities.

Sincerely,

Ned Flaherty  
75 Clarendon Street, #508  
Boston, MA 02116

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