

## **WCS\_CISFEISCEm Resource**

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**From:** KarenD Hadden <karendhadden@gmail.com>  
**Sent:** Thursday, March 09, 2017 4:50 PM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] Initial WCS scoping comments Docket No. 72-1050; NRC-2016-0231 , more coming with extended deadline  
**Attachments:** NRC scoping letter from SEED Coalition, Cindy Bladey March 9 .docx; ATT00001.htm

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**Comment Number:** 14328

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**Subject:** [External\_Sender] Initial WCS scoping comments Docket No. 72-1050;  
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**Recipients Received:**

Cindy Bladey  
Office of Administration  
Mail Stop: OWFN-12-HO8  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001;

Email: [WCS\\_CISF\\_EIS@NRC.gov](mailto:WCS_CISF_EIS@NRC.gov)

RE: Docket No. 72-1050; NRC-2016-0231 Waste Control Specialists LLC's Consolidated Interim Spent Fuel Storage Facility Project

Feb. 18, 2017

Dear Cindy Bladey and NRC,

SEED Coalition intends to send more extensive scoping comments regarding the WCS license application. I just spoke with Dawn Forter, whose number I received from a message on Carol Gallagher's phone. She stated that the comment period would be extended, but first must be closed and then re-opened. I'm hoping that you will ensure that no comments are lost in the gap between the closure of the comment period and its re-opening.

Furthermore, please know that SEED Coalition will be submitting additional comments in the re-opened time period based on the information I was provided on the phone today. Please advise me immediately at 512-797-8481 if this information is incorrect, as we are counting on it being accurate and the information is not available in writing yet.

Waste Control Specialists' (WCS) application to import tons of spent fuel, high-level radioactive waste, from nuclear reactors around the country and store it in Andrews County for 40 years (or longer) should be halted in order to protect public health and safety, including the health and safety of my constituents.

In the meantime here are some of our initial comments and concerns.

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 terrorism incidents that could occur along those routes. If the license gets approved, deadly waste would be transported through our region 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.

A 2014 Texas Commission on Environmental Quality report warns of potential sabotage of radioactive waste shipments, saying that such an incident would most likely occur in a large city rather than a rural area. Terrorist actions involving radioactive waste in the San Antonio region would be an unimaginable nightmare.

The EIS should look closely into the risk of groundwater contamination at the site, especially since the entire 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 terrorist actions 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.

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. We’ve had serious train accidents in our region. 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?

Please host a hearing on the WCS application so that those of us who would be put at risk can address the NRC on this important issue. I would appreciate a written response.

Sincerely,

Karen Hadden, SEED Coalition, Executive Director  
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512-797-8481 [karenhadden@gmail.com](mailto:karenhadden@gmail.com)



Dear Cindy Bladey and NRC Staff,

I was just informed by phone by Dawn Forter at NRC that there will be extension of the scoping comment deadline for WCS' consolidated interim storage facility license application, and that the comment period will close and then re-open with a new deadline of April 27, 2017.

Please confirm right away that this is accurate, as SEED Coalition intends to send additional comments during the extended time frame. I can be reached at 512-797-8481.

Thank you,

Karen Hadden, SEED Coalition, Executive Director  
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