

WCS_CISFEISCEm Resource

From: Meredith McGuire <mmcguire@trinity.edu>
Sent: Friday, March 10, 2017 5:05 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Docket #72-1050; NRC-2016-0231, WCS spent fuel storage

Cindy Bladey

Office of Administration

Mail Stop: OWFN-12-HO8

U.S. Nuclear Regulatory Commission,

Washington, DC 20555-0001;

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

March 10, 2017

Dear Cindy Bladey and NRC,

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.

The Environmental Impact Statement should include transportation routes and the potential impacts of accidents or terrorism incidents along those routes on public health and safety. If the license gets approved, deadly waste would be transported through our region for more than 20 years. Even one small accident would be one too many. We hear assurances that accident damage would be minimal, but 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 Dallas/ Ft. Worth 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, 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 built and 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 I don't consent to our state 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 train accidents in our region. 2015, a train derailed in our region – in Corsicana, Texas - after floodwaters washed out the track, and trains have collided head-on in West Texas at 65 mph.

Storing the nation's high-level radioactive waste in an area that is largely Hispanic would be a huge environmental injustice, and the impacts to the nearest communities and within a 50-mile radius of the site need to be carefully analyzed. Income levels should be examined as well in the socioeconomic analysis.

The environmental report should address the impacts of "interim storage" at the site becoming a dangerous permanent de facto disposal. 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. At what point could the waste go critical?

Please host a hearing on the WCS application in the Dallas/Ft. Worth region so that Texans who would be put at risk can address the NRC on this important issue. I would appreciate a written response.

Sincerely,

Meredith McGuire, Ph.D

Trinity University

Additional comments:

For more than 45 years I have taught courses about Environmental Health Issues; I am co-author of a major textbook in the field of Medical Sociology. Our field emphasizes examining the social factors that account for the high rates of preventable sickness and death in our country. Exposure to ionizing radiation, especially from high-level radioactive material, is one of those preventable causes.

There is no acceptable justification for risking high-level radioactive contamination of any people -- much less, a large city -- merely for temporary storage in a less-than-perfect repository. Already, thousands of Americans have sickened and many died due to radiation exposure from mining uranium and other radioactive materials, from working in processing plants that produced weapons-grade nuclear material or from living near nuclear reactors (e.g., Hanford) that were releasing deadly emissions, and from living downwind of above-ground nuclear testing. Chernobyl and Fukushima are clear evidence that nuclear power plants are also clear and present danger. It was a mistake to promote nuclear power in the first place. And, now that we have effective clean, save renewable alternatives, there is NO excuse to allow further expansion of nuclear power.

It is unacceptable for the U.S. government to approve any profit-making corporation's guardianship over so much deadly material, without requiring evidence that the corporation will guarantee public safety for however many centuries it takes for the material to become non-hazardous.

I do not consent. My children and grandchildren do not consent. Their children and grandchildren do not consent. . . . And so on!

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