## WCS_CISFEISCEm Resource

**From:** Bron Lucas <bronlucas@hotmail.com>
**Sent:** Friday, April 14, 2017 12:55 PM
**To:** WCS_CISFEIS Resource
**Subject:** [External_Sender] Docket ID NRC=2016-0231: Include Transport in EIS

To the Nuclear Regulatory Commission:

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

The Environmental Impact Statement (EIS) for Waste Control Specialists' license application should include:

1. A designation of national transportation routes TO and FROM WCS's Andrews, Texas site and the array of potential impacts of accidents or malicious attacks that could occur along those routes, including the legally allowed routine radioactive emissions from transport and storage casks.

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

3. 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.

4. The statement should include 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 and the EIS should outline how this would be accomplished ahead of time.

5. Since there is hazardous and mixed waste at the WCS site, the EIS must review the multiple, additive, cumulative and synergistic effects 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.

6. 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 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 add to or multiply impacts?

The EIS should independently review the risk of groundwater contamination at the site, especially since the all of the technical reviewers at the Texas Commission on Environmental Quality TCEQ recommended denying the license for “low-level” radioactive waste at the Waste Control Specialists site due to the proximity of groundwater.

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.

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.

Please know that we don’t consent to and support local communities that do not 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. The casks on the market today have never been tested, cannot be inspected for cracks and are not designed to meet real road, barge, or rail conditions that they would encounter in transit.

The EIS should address these potential dangers and worst case scenario consequences. Consider the potential impacts from accidents or radioactive waste related acts of malice along transport routes and at the site, including impacts to people, land, air, crops, animals and water.

Sincerely,

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