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(161)

Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-H08
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 13 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, including the health and safety of my constituents.

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,

Grace Aguilar

Signature

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Additional comments: