

WCS_CISFEISCEm Resource

From: Jan Boudart <janunaj@hotmail.com>
Sent: Friday, April 28, 2017 8:38 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Comments: Docket No. 72-1050; NRC-2016-0231 – Environmental Impact Statement

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[Docket No. 72-1050; NRC-2016-0231.pdf](#)

comments by attachment & in body of this post.

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April 28, 2017

By email to: WCS_CISF_EIS@nrc.gov
Ms 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 " Environmental Impact Statement
Public Scoping Comments about Waste Control Specialists LLC's
Consolidated Interim Spent Fuel Storage Facility Project

Dear Ms Bladey and the Nuclear Regulatory Commission:

Please do not approve the application of Waste Control Specialists (WCS) for a license to import half of the existing inventory of irradiated nuclear fuel from commercial nuclear power plants from around the country and store it at their dump site in Andrews County, Texas, for 40 years (or longer). Said application is inadequate to address the myriad problems with the proposed project. It does not **protect public health, safety and the environment.**

As a citizen of Chicago I am personally surrounded by nuclear waste. The largest U.S. installation of radiated fuel at Morris, other pools and pads at Zion, Dresden, Braidwood, LaSalle and Byron " all in Illinois, to say nothing of the threatening possibilities to Lake Michigan of Kewaunee in Wisconsin, and Big Rock Point, the highly embrittled reactor at Palisades and the accident-prone Cook " all in Michigan. This problem is not to be foisted upon others. I do not consent to Andrews, Texas becoming a national radioactive waste dumping ground. We should not have to risk contamination of land, water, air or the health of plants, wildlife, pets and livestock for a temporary *cum* permanent irradiated fuel "resolution." **The irradiated fuel should remain where it is,** except when a local community wants to move it away from the beach or off a geologic fault, as at San Onofre, Diablo Canyon, and others. More hazard and risk is created with each move. The irradiated fuel should be moved only once when a **geological repository** is ready.

Do not let WCS's Environmental Impact Statement ignore the danger to the Dockum, Ogallala, Pecos Valley, and Edwards-Trinity aquifers. The scope of the draft EIS for this proposed *de facto* permanent parking lot dump must include this knowledge: **Water is Life!** WCS's draft EIS must review and provide response comments about the recommendations of the Texas Commission on Environmental Quality (TCEQ) Radioactive Materials

Division to deny a license for "low-level" radioactive waste at the WCS site due to the proximity of groundwater.

1

The analysis must include environmental impacts in the event of a radiation release from the storage pad or along trans-national transportation routes to the WCS site.

The draft EIS must reveal water, rail and road transportation routes and the array of potential impacts of accidents and/or terrorism incidents that could occur along the routes over the proposed 24 years required for transport. It must also include potential accident and terrorism incidents at the site. One small accident could contaminate many acres of soil, tons of water, and cubic miles of air. Despite assurances that accident damage would be minimal, obviously real life disasters have occurred. Accidents can and have exceeded the worst anticipated scenarios: witness the March 11-16, 2011 Fukushima-Daiichi nuclear disaster in Japan which, still today, continuously spews radiation into the air and into the Pacific Ocean.

A single rail car would probably haul as much plutonium as the U.S. bomb dropped on Nagasaki. Although testing of the transportation casks has been conducted for accidents up to 60 mph, this scenario has already been exceeded in the region with great consequences. My example is the head-on collision near Amarillo TX on June 28, 2016. According to news stories, one of the trains was traveling 65 MPH. The draft EIS must address the increased transportation risks by barge, rail and road, particularly the danger to the air, water and land from a spent-fuel cask if it is accidentally immersed by lake or river.

A 2014 TCEQ report warned of potential sabotage of radioactive waste shipments and suggested that such an incident would most likely occur in a large city rather than in a rural area. But terrorist actions involving irradiated nuclear fuel along the routes would be an unimaginable nightmare anywhere, urban or rural.

Homeowners' insurance does not cover radioactive contamination. The draft EIS should explain how householders along the transportation routes across the U.S. and near the WCS site will be compensated in case of an accident or terrorism..

The draft EIS must include how the WCS will be monitored for radiation and other toxic releases to the air, soil and water; including the employment of outside monitors (watchdogs), private or government in the states of Texas and New Mexico.

The cumulative impact of proximate facilities in the area must be addressed. Urenco uranium enrichment facility, the proposed Eddy-Lea Energy Alliance " Holtec site, as well as the Waste Isolation Pilot Plant (WIPP): the closeness of these entities and the cumulative impacts of releases from the multiple facilities is important in the EIS.

Many, small amounts of seismic activity could create wear and tear on the foundation where the storage casks are installed, in addition, the EIS should attend to the effect of small fault movements on machinery.

There must be a provision for maintenance and service of the crane that lifts and moves casks.

Faulty or defective casks and weathering and seismic wear on them represents one of the most dangerous and unexamined conundrums among all the problems presented by storage of HLRW. The draft EIS should explain in detail, along with citations to the applicable regulatory requirements, how radioactive waste from a cracked and/or leaking canister would be handled. It appears that the WCS license application omits construction and operation of a wet pool or hot cell for such transfers. WCS and NRC should solve the problem and explain how transfers would be done and omit statements that they will figure it out when the problem arises.

Above-ground casks would be exposed to the weathering effects of temperature extremes, and natural disasters, including wildfires, tornadoes and earthquakes. The draft EIS should address these issues and answer the following questions:

2

1. Could the contents of a cask go critical? Possibilities are: with immersion in water, meltdown within the cask, unexpected upheaval where casks, or their contents, got too close to one another. etc. At what point could the irradiated fuel go critical?

2. What interactions and contact with other radioactive waste, and with the toxic and hazardous materials stored and disposed of at the WCS site, could occur?

3. What are the cumulative impacts of waste storage and disposal and the proposed storage of irradiated nuclear fuel at WCS and at nearby sites to workers, local people and the environment? In other words, what are the biological effects of decades of exposure to low-level raises in ambient radiation?

4. How large a factor would natural disasters add to the statistical risk of an out-of-design event?

5. What are the impacts of a highly unlikely, but significant, release of radioactivity at the site?

I respectfully request that NRC hold a public hearing on the draft Environmental Impact Statement in Chicago.

Please acknowledge my concerns with a written response.

2

Sincerely,

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