

Kirk Miller
517 Cap Rock Drive
Richardson, Texas 75080
Phone 972 699 1687
E-mail: kirkmiller@juno.com

2017
2016 MAY -1 7N 2:34

11/14/2016
81 FR 79531

April 15, 2017

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

169

RECEIVED

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

Dear Cindy Bladey and NRC staff,

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

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

The Environmental Impact Statement (EIS) 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 (TCEQ) 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, and 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 explain how this would be accomplished and not just say they will figure it out when the problem arises.

I do NOT consent to Texas becoming a national radioactive waste dumping ground. We should not have to risk contamination of our land, aquifers, air, or the health of plants, wildlife and livestock. Human exposure to high-level radioactive waste can lead to immediate death. A single rail car could haul waste containing as much plutonium as the bomb dropped on Nagasaki. We have had train accidents in our region. In 2015, a train derailed in our region -- Corsicana, Texas -- after floodwaters washed out the track, and trains have collided head-on in West Texas at 65 mph.

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 might never move again. Above-ground casks would be exposed to the weathering effects of temperature extremes, potential wildfires, tornadoes, and earthquakes.

Sincerely,

Kirk Miller
Kirk Miller

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
Add= J. Park (JRP)

J. Quintero (JMM)