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11/4/2017  
81FR 79531  
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RULES AND REGULATIONS

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

April 4, 2017

Dear Cindy Bladey and NRC,

Scoping Comments for: WCS License Application for Spent Fuel Storage Facility In Andrews County, TX, Docket No. 72-1050

Please consider the following issues for inclusion in the environmental impact study for the above-referenced Consolidated Interim Spent Fuel Storage Facility Project:

Please study the impacts to facility workers and the public related to the following:

- (1) Radiological risks (including but not limited to health, environmental, social and economic impacts) from malevolent attacks (including but not limited to ground-based and air-based attacks) that cause failure of the containment structures/casks.
- (2) Radiological risks (including but not limited to health, environmental, social and economic impacts) from natural disasters (including but not limited to medium and large magnitude earthquakes) that cause failure of the containment structures/tasks.
- (3) Radiological risks (including but not limited to health, environmental, social and economic impacts) caused by the absence of a so-called hot cell or equivalent capacity to repackage spent nuclear fuel (SNF).

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

J. Bainter (JMB)

(4) Radiological risks (including but not limited to health, environmental, social and economic impacts) anticipated from cask/containment failure irrespective of cause of such failure.

(5) The potential for the subject SFSF facility to remain in use for an extended period (more than 100 years), and implications thereof.

(6) In the event of complete single containment/cask failure, the nature and extent of radiological contamination of humans, air, soil, surface water and groundwater reasonably expected in the area of the SFSF including considerations of permanent or intermittent hydraulic connections between groundwater deposits.

(7) In the event of failure of all projected containments/casks (a worst case scenario), the nature and extent of radiological contamination of humans, air, soil, surface water and groundwater reasonably expected in the area of the SFSF including considerations of permanent or intermittent hydraulic connections between groundwater deposits.

(8) Impacts to and health and environmental implications of contamination groundwater underlying the area of the proposed SFSF.

(9) Cumulative impacts of the presence of projected quantities of SNF co-located with nearby so-called low-level radioactive waste facility.

(10) Environmental justice issues particularly related to the disproportionate health and environmental burdens the facility is likely to cause the majority minority community in the area of the proposed SFSF.

Thank you for addressing these concerns for public safety,

Lori Caulfield