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RULES AND DIRECTIVES
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USNRC

April 24, 2017
Cindy Bladey, Office of Administration,
Mail Stop: OWFN-12 H08, U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001.

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Dear Nuclear Regulatory Commission,
Administrator Cindy Bladey:

re: Comments referring to Docket ID NRC-2016-023. I want to express my concern about adding more nuclear waste hauling to Atlanta's transportation nightmares! Atlanta is not capable of dealing with a nuclear accident related to our transportation infrastructure. Waste Control Specialists' (WCS), a company interested in "interim storage" of spent nuclear fuel, has submitted an application to set up shop in Andrews County, TX. It would import tons of high-level radioactive waste from nuclear reactors around the country from state to state. Please consider very carefully the impact of granting this permission and of an accident. I have included some issues to be considered.

APPROVED

- The Environmental Impact Statement for Waste Control Specialists LLC's Consolidated Interim Spent Fuel Storage Facility Project 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 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.**
- 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, 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 have to explain how this would be accomplished and not just say they'll figure it out when the problem arises.
- Storing the nation's high-level radioactive waste in an area that is largely Hispanic would be a huge environmental injustice, and the impacts to the nearest communities and within a 50-mile radius of the site need to be carefully analyzed. Income levels should be examined as well in the socioeconomic analysis.
- 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 would likely never move again. Above-ground casks would be exposed to the weathering effects of temperature extremes, and potential wildfires, tornadoes and earthquakes. At what point could the waste go critical?

I am very concerned about this transportation issue of hauling nuclear waste around the country. Thank you.

Phyllis Miller, Decatur, GA

Phyllis Miller

SUNSI Review Complete

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E-RIDS= ADM-03

Add= J. Park (SRP)

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