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February 15, 2018

Mr. Jose Cuadrado, Project Manager
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Holtec License Application for CIS facility in Lea
County, New Mexico
Docket No. 72-1051

Dear Mr. Cuadrado:

On behalf of Sierra Club I have been reviewing the documents related to the application of Holtec International in the above docket, including the Safety Analysis Report and the Environmental Report. There are some obvious omissions in those documents that must be made readily available to the public in order for the Sierra Club and other members of the public to make informed decisions about intervening in these proceedings and in order for prospective intervenors to form contentions in support of intervention. Therefore, the NRC must not make a completeness finding for this application until all pertinent information regarding the application is made readily available to the public.

Some specific items of omission include the documents delineated in the February 13, 2018, letter sent to you by Ms. Diane Curran and Ms. Mindy Goldstein. In addition, with respect to the decommissioning plan, the Holtec SAR, § 13.3.2, states that the labor costs of decommissioning are based on a 2017 report by R.S. Means, but neither that report nor a summary of the costs set out in that report are made a part of the SAR. And in order for the Sierra Club or members of the public to access that report, it must be ordered from R.S. Means at a cost of almost \$500.

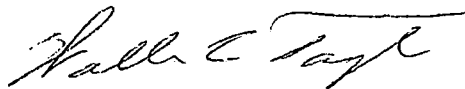
That is not acceptable for non-profit organizations and members of the public.

Another significant omission involves a statement in § 1.0 of the Holtec Environmental Report. It is stated there that construction of the proposed CIS will begin after Holtec successfully enters into a contract for storage with the U.S. Department of Energy. We need to know the nature of that contract because it is important to know if Holtec proposes that DOE will take ownership of the spent fuel, or would somehow otherwise finance the project.

In addition to the foregoing points mentioned herein, Sierra Club supports and joins in the February 13, 2018, letter sent by Ms. Curran and Ms. Goldstein, and the FOIA request attached thereto.

We look forward to your response.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Wallace L. Taylor".

Wallace L. Taylor