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Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Comment On:** NRC-2018-0052-0001  
Holtec International HI-STORE Consolidated Interim Storage Facility Project

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## General Comment

The Holtec Environmental Report (ER) states that the only two reasonable alternatives are no action and its proposed site. The ER inaccurately states that there are no licensed away-from-reactor facilities for accepting SNF from commercial reactors, thus not considering the Private Fuel Storage (PFS) site in Utah (License SNM-2513). The NRC draft environmental assessment must consider why the PFS site is not a reasonable alternative. The NRC website lists 14 other specific-licensed ISFSIs in addition to PFS, each of which must be considered as alternative storage sites. In addition, the NRC website lists 64 operating reactors with general licensed ISFSIs which much be considered as alternative storage sites.

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