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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

Southeast New Mexico, near the Texas border, has the dubious distinction that every single train car load of high-level radioactive waste will pass through on its way into (and, if it ever leaves, out of) Holtec International/Eddy-Lea [Counties] Energy Alliance (ELEA). But transport impacts, to eventually import more irradiated nuclear fuel than currently exists in the U.S. into s.e. NM, will be felt nation-wide. Transporting 100,000 metric tons, or more, of irradiated nuclear fuel to NM makes this proposal even bigger than the highly controversial, unacceptable Yucca Mountain, Nevada permanent burial dump scheme, in terms of transport impacts (limited to 70,000 metric tons under current law). In that sense, when it comes to radioactive waste transportation risks, we all live in New Mexico.

For this reason, only four NRC public comment meetings (three in s.e. NM, and one at the agency's HQ near Washington, D.C.), are woefully inadequate. Countless millions of Americans, in most states in the Lower 48, would be put at risk by these highly radioactive, irradiated nuclear fuel shipments by train, truck, and/or barge. (See, for example, the national transport impacts associated with the proposed Yucca Mountain, Nevada permanent burial dump for highly radioactive waste:

Nevada Agency for Nuclear Projects - Cities Potentially Affected by Shipments to Yucca Mountain (pdf-2.45M)

Nevada Agency for Nuclear Projects - States Potentially Affected by Shipments to Yucca Mountain, Nevada - Fred Dilger, PhD

ML18099A095

Nevada Agency for Nuclear Projects - Congressional Districts Potentially Affected by Shipments to Yucca Mountain, Nevada

The further from the targeted destinations (Yucca Mountain, NV and s.e. NM), the more identical the routes would be for shipments. The closer to the targeted dump-sites the shipments came, the more the NV and NM routes would diverge. But as you can see, shipments to NM, just like shipments to NV, would impact most states.

For this reason, NRC should be holding environmental scoping public comment meetings across the country, not just in s.e. NM (and a single "national" meeting at the agency's HQ in Rockville, MD). Americans nationwide should demand NRC hold a hearing in their impacted community! The U.S. Department of Energy (DOE), during its Yucca Draft Environmental Impact Statement (DEIS) public comment period many years ago, initially planned a dozen meetings nationwide. Under public pressure, DOE was forced to double the number of such meetings, in communities impacted elsewhere across the U.S., as well.

Such a scenario could unleash disastrous amounts of hazardous radioactivity into the environment, hence the label of potential "Dirty Bombs on Wheels." As San Onofre Safety has put it, each Holtec canister holds an equivalent amount of volatile (able to escape in a fire) radioactive Cesium-137 as was released by the Chernobyl nuclear catastrophe. And as Dr. Marvin Resnikoff of Radioactive Waste Management Associates has put it, a container holding 24 Pressurized Water Reactor (PWR) irradiated nuclear fuel assemblies holds 240 times the long-lasting radioactivity (in terms of radioactive Cesium isotopes alone, let alone the hundreds of additional hazardous radioactive isotopes) released by the Hiroshima atomic bomb. Only Holtec has moved on from containers holding 24 PWR assemblies, to ones capable of holding 37 assemblies! That would thus mean 37 Hiroshima atomic bomb's worth of long-lasting radioactivity in each container! Only its worse than that, as Resnikoff's figure applied to low burnup fuel; high burnup fuel, unfortunately commonplace today, is even more radioactive!