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# PUBLIC SUBMISSION

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 Holtec International HI-STORE Consolidated Interim Storage Facility Project

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 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.

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.

A de facto permanent surface storage "parking lot dump" at Holtec/ELEA in s.e. NM would only increase safety risks. It would not decrease them. It would multiply transport risks, as it would only be temporary

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(supposedly, even if decades, or centuries, or more, can be called "temporary"! ). All that highly radioactive waste would have to move again, to a permanent burial site (yet to be identified - that's a big IF! Yucca is NOT suitable!). And that could be back in the same direction from which it came in the first place, meaning transport corridor communities could see these high risks coming and going!

Holtec/ELEA's assumption that the dump at Yucca Mountain, Nevada will open someday, to take the highly radioactive waste away, is inappropriate. The vast majority of Nevadans have expressed their very adamant non-consent for 30+ years now, and still vehemently oppose it.

Holtec/ELEA's assumption that another permanent burial dump will be opened, by someone, somewhere, someday, somehow, is also inappropriate. After all, the search for a national geologic repository has gone on since the 1950s, but has failed. And DOE's current estimate for the opening of the U.S.'s first repository is 2048, 31 years from now. Except they have no idea where that will be. There is every likelihood that the 2048 date will slip into the future as well.

The failed Private Fuel Storage, LLC (PFS) parking lot dump targeted at the Skull Valley Goshutes Indian Reservation in Utah, likewise assumed the Yucca dump would open. They were, of course, incorrect. PFS was based on Holtec casks, just as is the current NM scheme.

So PFS's "Plan B" was to "return to sender." Holtec has a similar plan, if casks show up damaged or contaminated, in order to protect its supposedly "start clean, stay clean" Centralized Interim Storage Facility (CISF), or Monitored Retrievable Storage (MRS) site, in s.e. NM. If 100,000 metric tons of irradiated nuclear fuel - the amount targeted to go to Holtec/ELEA in s.e. NM - were to be "returned to sender" some decade or century due to the lack of a permanent dumpsite to send it to, what would that look like in terms of multiplied transport risks?

Maine Yankee was a PFS nuclear power industry consortium member. More than 50 rail sized containers of highly radioactive irradiated nuclear fuel would have traveled 5,000 miles round trip, from Maine to Utah, accomplishing absolutely nothing, other than exposing millions of people in numerous states to high-risk shipments. Another version of this is the fact that permanent burial sites could be located right back in the same direction from which the waste came in the first place. In fact, at one time, DOE was targeting two sites in Maine, seven sites in Vermont, and two sites in New Hampshire for permanent burial dumps.

This game of high-risk, highly radioactive waste musical chairs, or highly radioactive waste hot potato, on the roads (initial leg heavy haul truck shipments), rails, and waterways (initial leg barge shipments), is unacceptable. It amounts to Radioactive Russian roulette on the roads, rails, and waterways. Multiplying transport risks for no good reason is wrong, and makes no sense.