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## PUBLIC SUBMISSION

**Docket:** NRC-2018-0052  
Holtec International HI-STORE Consolidated Interim Storage Facility Project

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

**Document:** NRC-2018-0052-DRAFT-0022  
Comment on FR Doc # 2018-06398

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### Submitter Information

**Name:** Jeanne Green  
**Address:**  
P.O.Box 662  
Arroyo Hondo, NM, 87513  
**Email:** innerlight52@hotmail.com

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### General Comment

Ms.  
May Ma  
Office of Administration  
Mail Stop: TWFN7 A60M  
U.S. Nuclear Regulatory Commission  
Washington, DC 205550001

Re: Docket ID NRC-2018-0052  
Holtec Internationals HISTORE Consolidated Interim Storage Facility Project for Spent Nuclear Fuel, Lea  
County, New Mexico

Dear Ms. Ma:

file attached

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# Attachments

HoltecCommentJG

Ms.  
May Ma  
Office of Administration  
Mail Stop: TWFN-7-- A60M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Re: Docket ID NRC-2018-0052  
Holtec International's HI-STORE Consolidated Interim Storage Facility Project for Spent Nuclear Fuel, Lea County, New Mexico

Dear Ms. Ma:

I am submitting these scoping comments about the Holtec International Environmental Report (ER) to bring up to 100,000 metric tons of spent plutonium fuel, high-level radioactive waste, from nuclear reactors around the country to southeast New Mexico. Please know that I do not consent to becoming a national radioactive waste dumping ground or to transporting up to 10,000 canisters of highly radioactive waste through thousands of communities. I should not have to risk the contamination of our land, waters and air or the health of plants, wildlife and livestock, endangering present and future generations. We, in New Mexico, are already suffering from contamination from Sandia and Los Alamos Labs, with plumes of hexavalent chromium and perchlorates in our water tables and PCBs and explosives in our rivers and streams. New Mexico does not produce spent fuel rods and we should not be used as a dumping ground just because we are a poor state.

**I Request a 60-Day Extension of Time for this Comment Period**

A 60-day comment period places an undue burden on the public to review and provide informed comments about the 543-page Environmental Report (ER) technical document. In addition, this comment period overlaps several other comment periods currently on-going in New Mexico, including three comment periods for proposals to expand the Waste Isolation Pilot Plant (WIPP) and one for Los Alamos National Laboratory (LANL). There is also a public hearing about LANL operations scheduled for April 19- 20, 2018.

**This Holtec Proposal is Contrary to Current Law**

- Current law only allows the U.S. Department of Energy (DOE) to take title to commercial spent fuel "following commencement of operation of a repository" or at a DOE-owned and operated monitored retrievable storage facility. The Holtec site meets neither requirement, as it is a private facility.

**Holtec Must Remove Copyrights and All Redactions in the Environmental Report (ER)**

- NRC must require Holtec to produce an ER that has no such copyright restriction and has no redactions. The comment period should be extended 60 days from when a revised ER is noticed in the Federal Register and provided for public review and comment. Furthermore, it was just about impossible for me to find the ER from your website and I have a Masters and spent quite some time

looking for the document. How do you expect the general public to comment? NRC, please provide an accessible summary of the project and how it will be done so that the general public, who have jobs, don't have to spend hours trying to find out the basics on the project.

**The Impacts of Permanent Storage Must Be Analyzed**

- The ER is technically inadequate because it does not analyze the impacts of the spent fuel being left indefinitely at the proposed Holtec site, which from a historical perspective will probably be the case.

**More Alternatives Must Be Analyzed for in the Environmental Report**

- Keeping the spent fuel casks in some form of Hardened On-Site Storage (HOSS) at the reactor sites must be analyzed for. It is the option most likely to prevent particularly hazardous and injurious transportation accidents of the unknown kind.
- The alternative of consolidated storage being done at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) must be analyzed for.
- 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 must be considered as alternative storage sites.

**The Environmental Report Inadequately Discusses the Transportation Risks**

- This ER must include all possible transportation routes from all the reactor sites to the proposed Holtec site. It must include the potential impacts of accidents or terrorism incidents to public health and safety along all routes. The potential for terrorist acts increases exponentially with the transport problem associated with this proposed facility. That should be enough in itself to deny this proposal outright.
- The ER is technically inadequate and incomplete because it does not discuss how rail shipments from reactors without rail access would be accomplished and the risks and impacts of such shipments.

**The Consequences to an Accident-Exposed Individual Must Be Analyzed**

- Exposures to individuals are not addressed. Terms like "collective dose risk" and "person-rem" are used to ignore the potential impacts to a single individual. Impact to an individual must be analyzed for. What if I am stuck in traffic for ten

minutes next to a rail shipment that's emitting gamma radiation? Will I get cancer or leukemia in 10 or 20 years? The collective dose risk statistics are meaningless to those who unwittingly get cancer. Where in your analysis do you include real human beings, including women and children?

**Cracked and Leaking Casks Must Be Addressed**

- The ER does not analyze completely how radioactive waste from a cracked and/or leaking canister would be handled. Many nuclear reactor sites do not have a wet pool or hot cell to repackage the spent fuel rods. The ER must analyze this scenario.

**Seismic Impacts on Stored Casks Must Be Stated**

- Although the ER gives a statement on recent seismic activity in the area, there is no analysis of what many 3.0 – 4.0 M fracking-induced earthquakes would have on individual and collective buried casks.

**More Cumulative Impacts Must Be Analyzed**

- The ER mentions WIPP but does not analyze the impacts of a radiological release from WIPP on the proposed Holtec site. Nor does it analyze for a radiological release from the proposed Holtec site on WIPP. A release from either facility could have catastrophic public health and environmental impacts. Analyses of both releases must be done.

**Impacts of Future Railroads and Electric Lines Must Be Analyzed**

- The railroads and electric lines to the proposed Holtec site are not in place. The essential services must be analyzed for.

**How Many of the Estimated 135 Jobs Will Go to Local People?**

- The total number of annual workers at the site could total as many as 135 when construction jobs are combined with the operating workforce. The ER neglects to explain how many of those jobs will go to local people.

Thank you for taking comments.

Sincerely, Jeanne Green, Arroyo Hondo, NM 87513