

# PUBLIC SUBMISSION

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**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-0027  
Comment on FR Doc # 2018-06398

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## Submitter Information

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## General Comment

See attached file(s)

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## Attachments

US Nuclear Regulatory Commission April 18

**SUNSI Review Complete**  
**Template = ADM-013 E-**  
**RIDS=ADM-03 ADD=**  
**Antoinette Walker Smith**  
**JILL Caverly (jsc1)**

**COMMENT #27 PUBLICATION**  
**DATE: 3/30/2018**  
**CITATION # 83 FR 13802**

ML 18115A096

US Nuclear Regulatory Commission

April 18, 2018

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

I respectfully submit my comments in opposition to Holtec's proposal to build an "interim" high-level nuclear waste storage site in New Mexico, as the handling of this waste is a matter of grave public concern.

It is responsibility of the several owners of nuclear power plants to use the absolute best technologies for safeguarding this waste. This should be kept in "hardened on site storage" at each of the plant sites and not transported until a secured permanent national repository is permitted and built. It is currently illegal, and rightfully so, to transport and store this waste at a "temporary" site, as Holtec proposes. As the preponderance of nuclear plants are in the eastern half of our nation, any permanent storage facility should be built in the east. I also think waste from Palo Verde nuclear plant should stay in southern Arizona. Waste from plants in California, including the old Humboldt plant, should be moved away from the ocean and stored safely in a certified permanent repository within California.

Is it true that Holtec's casks are thin-walled and subject to leaking? If true, this is irresponsible and unacceptable for public safety! Additionally, the specter of transporting this waste by train through 44 states is outrageous. Accidents would occur. The adverse impacts to environmental and public health and safety in both urban and rural communities would be enormous and must be addressed. Just the weight of the casks loaded on train cars and rails is scary! Disasters are assured! Holtec's ER must be rejected by NRC as incomplete and inadequate.

While ELEA, the limited liability company supporting this proposal, has its eyes on federal dollars, this proposal would fail as constructive economic development, because it seriously threatens the agricultural and tourism industries in southeastern New Mexico. Even the WIPP facility is threatened. This is highly toxic waste that must be secured for thousands

of years. Should a limited liability company or any corporation be relied upon to safeguard our communities for the foreseeable and unforeseeable future? No!

Again, the utilities that own nuclear plants should be held responsible for the costs of safely storing this waste in the near-term and long-term and liable for all radioactive releases.

Sincerely,

Don Hyde

Albuquerque NM