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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

Consolidated Interim Storage of spent High Level nuclear fuels from the nation's nuclear power plants should be opposed and not permitted by the U.S. Nuclear Regulatory Commission.

Though the nuclear power industry has for decades fraudulently promised to dispose of its highly radiological and toxic nuclear wastes, it has not done so. Nor has the federal government fulfilled its role in siting and constructing a permanent and safe repository for the lethal by products.

Still, the NRC should not exacerbate the current dangerous situation of storing spent nuclear fuels on site at nuclear power plants, frequently in vulnerable cooling pools, and in locations that could be prone to natural disasters, such as earthquakes and or floods. By allowing the nuclear industry to conveniently dispose of its nuclear wastes at the Holtec HI-STORE in Lea, NM, the NRC will neglect its responsibility to guard the public from the radiological threats created by nuclear power generation and its by products.

There is nothing "interim" about this proposed CIS facility. There is no subsequent plan to permanently store tens of thousands of tons of highly radioactive spent fuel once these materials are delivered to the Holtec site in New Mexico. For all practical purposes, the HI_STORE site must be considered a permanent repository, though it has not been engineered nor designed to adequately or safely meet the specifications of a "permanent repository" On these grounds alone, NRC must reject Holtec's HI_STORE permit application.

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Further, the transport of these highly radiological and toxic spent nuclear fuels has not been adequately studied nor subjected to NEPA scrutiny. A single truck or rail accident involving these deadly materials in a populated area could cause vast damage both to human life, health, and the regional economy.

NRC has failed to insure that the Holtec canisters proposed for the transport of these spent nuclear fuel rods are safe and reliable. NRC should rather develop safety and quality standards such as "repairability", "measurability" and "retrievability".

Though it is imperative that these dangerous nuclear spent fuels, totaling over 80,000 Tons around the country be secured, it is equally imperative that any canister and transport technology used in storing on site or depositing these materials at a permanent repository meet the most rigorous quality and engineering standards. Such safety standards cannot be verified for the Holtec canisters, and therefore NRC should reject the HI_STORE permit.

It appears to me that the nuclear industry is seeking to shift to the federal government the huge financial liability of maintaining and storing its nuclear fuel wastes. If the federal government is to eventually assume financial responsibility for these radiological materials, at a future permanent repository, the NRC must assure that the facility is indeed permanent, meets all NEPA requirements, views the transportation leg of the nuclear materials as integral to the project and its permitting process, and holds the nuclear industry accountable for the lethal waste it has created over the past 60 years. None of these standards are achieved by the Holtec HI_STORE application and therefore NRC must deny its permit.