



Office of Peace, Justice & Creation Stewardship

Under the auspices of Catholic Charities of Gallup Diocese

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U.S. Nuclear Regulatory Commission
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RE: Docket ID NRC-2018-0052, Holtec International's HI-STORE CIS Facility for Spent Nuclear Fuel, Lea County, New Mexico

NRC:

As concerned people of faith in Catholic parish communities in New Mexico, we respectfully submit these scoping comments on the Holtec Environmental Report (ER) to bring up to 100,000 metric tons of spent fuel, high-level radioactive waste, from nuclear reactors around the country to southeast New Mexico.

In light of our Covenant relationship with our Creator to be responsible stewards of God's gifts intended for the life and wellbeing of the entire community of life, we strongly oppose plans to make New Mexico a national radioactive waste dumping ground or to transporting up to 10,000 canisters of highly radioactive waste irresponsibly putting at risk the lives, health and environment of thousands of communities throughout our country. We should not have to risk the death-dealing contamination of our land, aquifers, air or the health of vegetation, wildlife and livestock, endangering present and future generations.

This Holtec Proposal Is Contrary to Current Law

- Current law only allows the U.S. Department of Energy 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

- NRC must require Holtec to produce an ER that has no such copyright restrictions and has no redactions.

The Impacts of Permanent Storage Must Be Analyzed

- The Environment Report (ER) is inadequate and incomplete because it does not analyze the impact of the spent fuel being left at the Holtec site indefinitely.

More Alternatives Must Be Analyzed

- Keeping the spent fuel casks in some form of Hardened On Site Storage (HOSS) on the reactor sites must be analyzed.
- The alternative of consolidated storage being done at an existing licensed Independent Spent Fuel Storage Facility (ISFSF) must be analyzed.

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The Environmental Report Inadequately Discusses the Transportation Risks

- This ER must include all transportation routes and the potential impacts of accidents or terrorism incidents on public health and safety along all the routes.
- The ER is 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 waste would be approximately 40% heavier than current railcar weight limitations creating massive risks of derailments. The national transportation risks endanger every community along the route, posing dangers to national security.
- Who are financially liable to pay compensation when, not if, radioactive waste spill accidents occur causing widespread radioactive contamination and long term adverse health and environmental impacts for individual victims and impacted communities?

The Consequences To An Accident-Exposed Individual Must Be Analyzed

- Terms like "collective dose risk" and "person-rem" are used to ignore the potential impacts to a single individual.

Cracked And Leaking Casks Must Be Addressed

- The ER does not analyze exactly how radioactive waste from a cracked and leaking canister would be handled, since there is no wet pool or hot cell at the site.

More Cumulative Impacts Must Be Analyzed

- The ER mentions WIPP but does not analyze the impacts of a radiologic release from WIPP on the proposed CIS site.

Impacts of Future Railroads and Electric Lines Must Be Analyzed

- * The railroads and electric lines are not in place, but must be analyzed.

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 fracking induced earthquakes will have on the buried casks.

As we strive to be consistent with the values and ideals of our democratic nation, in a world witnessing increasing conflict and violence, we urge NRC to be cognizant of moral, ethical and environmental justice principles that need to be included in all deliberations, permitting, licensing and regulations. As never before, we are challenged to uphold the value and dignity of every person's life, safeguarding and insuring good health and wellbeing for all peoples and the natural environment of our beautiful land, which sustains all life.

Sincerely,

Rose Marie Cecchini, MM, Ph.d.

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Director