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Add= Antoinette Walker Smith  
Jill Caverly (JSC)  
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April 15, 2018

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 respectfully submit 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. We 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.

**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.

### **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. These fuels last for uncounted millennia and what happens when permanent storage becomes permanent disastrous damage to the earth and waters where they are secreted?

### **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.
- The alternative of consolidated storage being done at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) must be analyzed for.

### **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 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.

### **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. The winds and weather carry such releases many hundreds of miles afield and damage soil and water. 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.

Sincerely,

*Judith Bronner*  
 Judith Bronner

Taos, NM 87571