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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

Document: NRC-2018-0052-DRAFT-0040

Comment on FR Doc # 2018-06398

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Government Agency Type: Local

General Comment

See attached file(s)

Attachments

JComments on Holtec due May 29 FINAL

SUNSI Review Complete

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COMMENT #49

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May Ma
Office of Administration
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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Docket No. 72-1051; Holtec International's HI-STORE CIS Facility for Spent Nuclear Fuel, Lea County, New Mexico

NRC:

We respectfully submit these scoping comments on the Holtec Environmental Report (ER) to transport up to 100,000 metric tons of spent fuel, high-level radioactive waste, from nuclear reactors around the country to southeast New Mexico. San Luis Obispo Mothers for Peace (SLOMFP) does not consent to the irradiated nuclear fuel that has been produced by the Diablo Canyon nuclear reactors being sent to another community. This would entail the movement of 10,000 canisters of highly radioactive waste through thousands of communities. Furthermore, the site would likely become a national radioactive waste dumping ground. SLOMFP asserts that it is morally repugnant to send this deadly waste on our rails and highways to a poor community of color. Diablo's waste must continue to be stored on-site until a permanent repository can be found.

SLOMFP Requests A 60-day Extension Of Time For This Comment Period: A 60-day comment period places an undue burden on the public to respond to this 543 page technical document.

This Holtec Proposal Is Contrary To Current Law - Current law only allows the U.S. Department of Energy to take title of 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.

The Impacts Of Permanent Storage Must Be Analyzed: The Environmental Report (ER) must analyze the impacts of this "interim storage" becoming a dangerous de facto permanent facility. The ER is inadequate and incomplete because it does not analyze the impacts of the spent fuel being left at the Holtec site indefinitely. In order for the licensing process to proceed, the NRC must include such an analysis in its draft environmental impact statement (EIS).

More Alternatives Must Be Analyzed:

- o The spent fuel casks could be stored in some form of Hardened On Site Storage System (HOSS). The ERA does not include a comparison of the safety and cost impacts of the Holtec Consolidated Interim Storage (CIS) compared to keeping the waste safely on site. The NRC must include such an analysis in its draft EIS if the licensing process proceeds.
- o The alternative of consolidated storage at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) must be analyzed. According to the NRC

website, there are 64 reactor sites with general-licensed ISFSIs in various parts of the nation. The ER must analyze if one or more of those sites could provide some or all of the consolidated storage proposed by Holtec. The NRC must also include such an analysis in its draft EIS if the licensing process proceeds.

The ER Inadequately Discusses The Transportation Risks: The transportation risks are based on a two-year old document for another facility. To analyze the transportation risks for this ER, Holtec simply took the WCS report and multiplied it by 2.5. The transportation risks are based on three sample routes to only three reactor sites, which are supposed to represent all the routes to all the reactor sites. Yet, Holtec proposes to bring ALL of the spent fuel from all of the commercial reactors.

This ER must include transportation routes and the potential impacts of accidents or terrorism incidents on public health and safety along all the routes. The ER states that high-level radioactive waste would be transported over a period of more than 20 years. Terrorist acts involving radioactive waste in a large metroplex would have extremely high consequences, and it must be analyzed.

The ER is inadequate and incomplete because it does not include an adequate analysis of all transportation routes and modes from all reactors. Furthermore, it does not discuss how rail shipments from reactors without rail access would be accomplished or the risks and impacts of such shipments. The NRC draft EIS must also analyze these transportation risks and impacts if the licensing process continues.

This proposed "storage" site is not a "disposal" site, and at some future point the spent fuel will need to be removed and sent to a disposal site. This would double the transportation risk stated in this ER. The ER is inadequate and incomplete because it does not include an analysis of such additional transportation routes, risks, and impacts.

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. If a cask arriving at the site is cracking or leaking, it might not be allowed to "return canisters." Page 214. The ER is inadequate and incomplete because it does not analyze these situations. The NRC draft EIS must include such an analysis if the licensing process proceeds.

Sincerely,

San Luis Obispo Mothers for Peace

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