

May 5<sup>th</sup> 2018

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Office of Administration

Mail Stop: TWFN-7- A60M

U.S. Nuclear Regulatory Commission

Washington, DC 20555- 0001

**SUNSI Review Complete**

**Template = ADM-013**

**E-RIDS=ADM-03**

**ADD= Anntoinette Walker-  
Smith' Jill Caverly (JSC1)**

**COMMENT #71**

**PUBLICATION DATE: 3/30/2018**

**CITATION: 83 FR 13802**

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

NRC:

I 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. I am submitting the following comments because I do not support making New Mexico a national radioactive waste dumping ground. I do not consent to transporting up to 10,000 canisters of high-level radioactive waste through thousands of communities across the United States. I do not consent to the nationwide transportation risks of contamination of lands, aquifers, air, or the health of plants, wildlife, and livestock. I do not consent to endangering present and future generations.

I formally request a 60-day Extension Of Time For This Comment Period. A 60-day comment period places an undo 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 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 restriction and has no redactions.

**The Impacts Of Permanent Storage Must Be Analyzed**

- The Environmental Report (ER) is inadequate and incomplete because it does not analyze the impacts 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 (ISFSI) must be analyzed.

**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 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.

**How many of the estimated 135 jobs will go to locals?**

- The total number of annual workers at the site could total as many as 135 when construction jobs are combined with the operating workforce.

**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.

[Enter your own comments here.] Our area is already overrun with nuclear waste and uranium enrichment. We do not need any more hazardous materials near our communities! Please put our citizens well-being first!

Sincerely,

Signed

*Ashley Mathews*

Name (Print)

Ashley Mathews

City & State

Ednice, NM