

Holtec-CISFEISCEM Resource

From: Kevin Kamps <kevin@beyondnuclear.org>
Sent: Friday, May 11, 2018 4:45 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Docket ID NRC-2018-0052; Holtec International's HI-STORE CIS Facility for Spent Nuclear Fuel, Lea County, New Mexico

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. (Actually, Holtec used to use the figure of 120,000 metric tons; NRC's own March 30, 2018 Federal Register Notice would seem to indicate the actual figure may be as high as 173,600 metric tons!) I am submitting the following comments because I do not consent to New Mexico becoming a national radioactive waste dumping ground. I do not consent to transporting up to 10,000 canisters of highly radioactive waste through thousands of communities nationwide. I do not consent to the risk of contamination of our lands, aquifers, air, or the health of plants, wildlife, and livestock. I do not consent to endangering present and future generations.

I formally request that additional scoping meetings for public comment be held across the country, in hard hit transport hub corridor communities. A coalition letter signed by 52 organizations across the U.S. requested a 180-day extension to the public comment period, and an additional 18 public comment meetings in transport communities nationwide, such as: Atlanta, GA; Boston, MA; Chicago, IL; Cleveland, OH; Dallas/Forth Worth and San Antonio, TX; Detroit, MI; Kansas City and St. Louis, MO; Los Angeles, CA; Miami and Tampa, FL; Minneapolis/Saint Paul, MN; Nashville, TN; New York City, NY; Newark, NJ; Omaha, NE; Philadelphia and Pittsburgh, PA; and Tampa, FL. I endorse that call.

I also request additional Public Scoping Meetings for other New Mexico communities that will be impacted by the transport, including but not limited Clovis, and at least one in Dallas/Ft. Worth, San Antonio, and Midland, Texas since there would likely be extensive transport through these cities.

1. 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.

2. 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.

3. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. 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, or vice versa.

9. Impacts Of Future Railroads And Electric Lines Must Be Analyzed The railroads and electric lines are not in place, but must be analyzed.

10. 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.

11. 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.

Thank you for your consideration,

Kevin Kamps

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