

Holtec-CISFEISCEM Resource

From: MELANIE DEASON <melaniedeason54@gmail.com>
Sent: Saturday, May 12, 2018 1:23 AM
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

TO WHOM IT MAY CONCERN: 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 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.

OUR LIVES MATTER!

I formally request that EVERY scheduled meeting have time for public comments. I also request additional Public Scoping Meetings for other New Mexico communities that may be impacted by the transport, including but not limited to: Albuquerque, Clovis, and Gallup. Also include Las Cruces, NM and neighboring El Paso, TX.

Plus, SEVERAL (more than one in each): Dallas/Ft. Worth, San Antonio, and Midland, TX. 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 (1) commercial spent fuel "following commencement of operation of a repository"; or (2) at a DOE-owned and operated monitored retrievable storage facility. The Holtec site meets neither requirement, as it is a private facility. WITHOUT DOE's involvement there CANNOT be a site for delivery of these spent nuclear fuels or any Holtec-related side-actions.

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. THE PUBLIC ARE ENTITLED TO KNOW THE FACTS AND OMISSIONS!

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.

GROUNDWATER IS WITHIN 20 FEET OF THE BASE CONCRETE LAYER OF SUPPORT FOR THESE DUG-DOWN STORAGE VESSELS! THAT IS INSANITY! TOO MANY PEOPLE DEPEND UPON THE WATER TABLE/AQUIFERS UNDERNEATH.

PLAYA BASINS ARE ON THE SITE AND ARE DIRECT TRANSPORT TO THE WATER TABLE BELOW. HEAVING AND SINKING OF GROUND WOULD BE EXPECTED FRO THE EXTREME WEIGHTS OF THE HOLTEC STORATE, PLUS FLUXUATING WATER IN PLAYAS WOULD LIKELY CAUSE UPLIFT. THUS EXTREME GROUND INSTABILITY!

LEAKING OR NOT FROM THE CANISTERS, THE RADIATION BEING IRRADIATED INTO THE GROUND IS NOT ENOUGH TIME, DISTANCE OR SHIELDING TO AVOID CONTAMINATION OF WATER RESOURCES. FURTHERMORE, THERE IS NOT ENOUGH WATER TO DILUTE, NOR SHOULD IT BE EXPECTED TO DILUTE. THE LACK OF STANDARDS DOES NOT MEAN IT IS SAFE! THE THREAT IS THERE AND REAL, THEREFORE DO NOT ENDANGER ANYONE OR ANYTHING!

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 SCIENCE OF HOLTEC'S CANISTERS/TRANSPORT METHODS ARE UNTESTED IN REAL-TIME!

Therefore, above-ground storage is a perfect solution to develop appropriate TECHNOLOGY AND MONITORING, AT THE SITE WHERE THE NUCLEAR WASTE CURRENTLY EXISTS! Movement of the waste would only endanger more lives/communities.

The alternative of consolidated storage - being done at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) - must be analyzed, and appropriate science perfected! ABOVEGROUND STORAGE IS THE ONLY SOLUTION, AND WHERE THE WASTE CURRENTLY EXISTS AT/NEAR OTHER REACTOR SITES. DEVELOP THE SCIENCE AND MONITOR ON-LOCATION.

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 PUBLIC IS ENTITLED TO KNOW, SO THAT THEY CAN POINT OUT POTENTIAL HAZARDS AND SOLUTIONS, IF ANY! WORKING IN A VACUUM OF SECRECY IS UNETHICAL AND IMMORAL!

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. NM IS TOO BACKWARDS ON BOTH HIGHWAY/ROADWAYS, AS WELL AS RAILWAYS!

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. MILITARY MODELS OF GROUP-EXPOSURE IS INAPPROPRIATE. THE CIVILIAN POPULATION DESERVES BETTER!

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. COMPUTER MODULES ARE NOT REAL-TIME TESTING! GET HONEST AND DO THE PROPER TESTING. USE EUROPEAN GUIDELINES AND STRATEGIES SINCE THEY HAVE TOUGHER STANDARDS.

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.

WIPP IS CLOSE TO THIS SITE, SO THAT FUTURE RELEASES ARE LIKELY - BECAUSE THE BACKGROUND IS ALREADY TOO HIGH FOR THE CITIZENS OF THE ARTESIA AREA! READINGS ARE COMPARABLE TO WASHINGTON STATE'S FACILITY THAT IS UNDERGOING REMEDIATION. THAT'S PROOF THAT WIPP IS EXPOSING LOCALS TO UNACCEPTABLE RISK. ANY EXPOSURE IS UNACCEPTABLE!

9. Impacts Of Future Railroads And Electric Lines Must Be Analyzed.

The railroads and electric lines are not in place, but must be analyzed. N RAILROADS ARE IN DEPLORABLE CONDITION AND RECENT RR ACCIDENTS ONLY CONFIRM THE RISKINESS OF TRANSPORTING NUCLEAR MATERIALS BY RAIL.

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. 55 ARE LISTED IN THE PERMIT FOR PERMANENT JOBS! WHEREAS, DAIRY AND RELATED

AGRICULTURE ARE 23,000, PLUS OIL&GAS INDUSTRY IS 105,000. THE TRADEOFF OF HOLTEC'S PROPOSAL DOES NOT MAKE ECONOMIC SENSE NOR INDEMNIFY THESE OTHER JOBS FROM HARM!

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.

KARST GEOLOGY IS NO PLACE TO PUT ANY NUCLEAR WASTE! CAVERNS AND SINKHOLES, AND BOTTOMLESS LAKES ARE EXACTLY THAT - GIANT VOIDS THAT CONNECT TO EACH OTHER!

PLUSL, THE SMU (SOUTHERN METHODIST UNIVERSITY) DATA using radar and satellite imagery IS AVAILABLE ON GROUND SUBSIDENCE AND MOVEMENT IN THE OIL FIELDS. FRACKING IS CAUSAL, AND AT WOULD THEREFORE EXTEND INTO NM. FRACKING IS OCCURING AT EXTREMELY ACTIVE RATES ALL AROUND HOLTEC'S PROPOSED SITE.

STOP HOLTEC'S PROPOSAL FROM GOING ANYWHERE! DEATH BY RADIATION POISONING IS MURDER - WHETHER ON SITE IN NEW MEXICO, OR ALONG TRANSPORTATION ROUTES.

THE GOVERNMENT SHOULD SUPPORT THOSE COMMUNITIES THAT NOW HAVE 'THEIR' PROBLEM, AND FIND BEST MANAGEMENT PRACTICES FOR THEIR RESPECTIVE COMMUNITIES. TAKE RESPONSIBILITY AND KEEP IT AT HOME!

Thank you for your consideration,
MELANIE GREER DEASON

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