

ADMRegs-Holtec-CISFEISCEm Resource

From: ADMRegs-Holtec-CISFEIS Resource
Sent: Tuesday, May 22, 2018 2:21 PM
To: ADMRegs-Holtec-CISFEISCEm Resource
Subject: HOLTEC COMMENT #78
Attachments: NRC-2018-0052 DRAFT 0068 #78 ATT.pdf; NRC-2018-0052 DRAFT 0068 #78.pdf

Holtec CISF
FDMS Comment Number:
DOCKET ID: NRC-2018-0052
83-FR-13802

Re: "Docket ID NRC-2018-0052"

Submitted by Kevin Kamps, Radioactive Waste Specialist, Beyond Nuclear, May 11, 2018

Public Comment re: Risk of *De Facto* Permanent, Surface Storage, "Parking Lot Dumps"

What if so-called interim surface storage (for "only" 40 years, which is already a long time, in most people's books!) becomes much longer term, or even *de facto* permanent?

A major problem with *de facto* permanent, surface storage is, the containers could eventually breach (as via age-related degradation, due to exposure to the elements), and disgorge their hazardous and deadly, highly radioactive contents into the environment. This would represent a catastrophic release of large amounts of hazardous radioactivity into the environment, which could then blow downwind, and flow downstream, to harm people and other living things, up the food chain, and down the generations.

In its Feb. 2002 Final Environmental Impact Statement (FEIS) for the proposed Yucca Mountain, Nevada national repository for highly radioactive wastes, the U.S. Department of Energy (DOE) warned that irradiated nuclear fuel dry cask storage, if abandoned at reactor sites over a long enough time period, would eventually fail and cause catastrophic radioactivity releases into those local environments. But the same could happen in s.e. NM at Holtec/ELEA, and in w. TX at WCS, if CISFs (Centralized Interim Storage Facilities), also known as MRS (Monitored Retrievable Storage sites) are constructed and operated there. No matter where such catastrophic radioactivity releases would occur – at reactor sites across the U.S., or "away from reactor," along the TX/NM borderlands – they would be equally unacceptable, and must be prevented at all costs!

What if future replacements for today's U.S. Representatives from these adjacent congressional districts in NM and TX (some, but not all, of whom are blinded by radioactive dollar signs, and think these CISFs are a good idea!), decide enough is enough, and the high-level radioactive wastes need to move? Those one or two future U.S. Representatives from the TX/NM borderlands, would then face the daunting challenge of overcoming the inertia, or even active opposition, of the other 433-434 Members of the U.S. House of Representatives, who might be just fine with the highly radioactive, irradiated nuclear fuel wastes staying put at WCS, TX and/or Holtec/ELEA, NM forevermore (it's not in *their* congressional district, after all!) – which is how long they remain hazardous by the way. (The U.S. EPA has acknowledged a *million* years of hazard associated with irradiated nuclear fuel! See just below.)

Similarly, even if the TX and NM U.S. Senate delegations united in their opposition to “interim” storage becoming *de facto* permanent, they would represent only four U.S. Senators, facing off against 96 others!

WCS is short for Waste Control Specialists, LLC. It is located in Andrews County, Texas, immediately upon the New Mexico border at Eunice. Holtec/ELEA refers to Holtec International and Eddy-Lea [Counties] Energy Alliance, located halfway between Hobbs and Carlsbad in s.e. NM. The two CISFs (Centralized Interim Storage Facilities), or MRSs (Monitored Retrievable Storage sites), could import 100,000+ metric tons (120,000 MT, a figure Holtec used to use; or 173,600 MT, the figure which NRC’s own March 30, 2018 Federal Register Notice seems to indicate is the actual amount be proposed) of irradiated nuclear fuel and other highly radioactive wastes (Holtec/ELEA), and an additional 40,000 metric tons at WCS, TX. There is currently around 81,000 metric tons of commercial irradiated nuclear fuel in the U.S., so Holtec/ELEA and WCS could accommodate significantly more than twice that amount (enough capacity to store additional highly radioactive irradiated nuclear fuel wastes generated by U.S. atomic reactors for decades to come!), if both opened and operated! After all, $173,600 \text{ MT} + 40,000 \text{ MT} = 213,600 \text{ MT}$. That is more than that two and a half times more commercial irradiated nuclear fuel than currently exists in the United States, after 61 years of commercial atomic reactor operation thus far (1957 to 2018).

The two proposed CISFs/MRSs are located just 38 miles apart (this figure cited by Holtec’s CEO at an April 2017 press conference on Capitol Hill). In a real sense, this is a single proposal. In fact, Holtec CEO Kris Singh said at that same press conference on Capitol Hill in April 2017 that he does not see Holtec/ELEA and WCS are competitors, but rather as complementary. This is a blatant attempt to turn the Texas/New Mexico borderlands into a highly radioactive waste sacrifice zone for the rest of the country!

In 2008, under court order, the U.S. Environmental Protection Agency (EPA) acknowledged that commercial irradiated nuclear fuel remains hazardous for a million years into the future. This is actually an underestimate. Take Iodine-129, as but one example. Its half-life is 15.7 million years. It will remain hazardous for at least ten half-lives, or 157 million years. I-129 is an artificial radioactive isotope, generated by atomic reactors, contained in highly radioactive irradiated nuclear fuel waste, too.

A 2013 U.S. Senate bill – forerunner to current versions of the legislation in Congress – added to the risks of “interim” storage sites becoming *de facto* permanent parking lot dumps, by stating a preference for co-location of pilot, so-called priority, interim storage, alongside large-scale, full-scale, non-priority interim storage, and even the permanent repository (that is, permanent burial dump).

In the past, there have been previous attempts to turn s.e. NM into a highly radioactive waste permanent geologic disposal site, such as at or near the WIPP

(Waste Isolation Pilot Plant) site. There were also previous attempts to turn s.e. or s. central NM into a MRS site – namely, at the Mescalero Apache Indian Reservation, first during the DOE’s own “Nuclear Waste Negotiator” process in the late 1980s and early 1990s, and then during a “private” nuclear power utility consortium efforts in the early to mid-1990s. Both schemes were stopped dead in their tracks.

Also, the waiver of any connection or "linkage" between development of centralized interim storage facilities (CISFs, a.k.a. Monitored Retrievable Storage, MRS, sites), and progress toward opening a repository, only increases the risk that stored wastes will simply be allowed to remain in centralized, so-called “interim,” surface storage facilities indefinitely into the future. In other words, they could become *de facto* permanent, surface storage, “parking lot dumps.”

U.S. Senator Jeff Bingaman (Democrat-NM), Chairman of the Energy and Natural Resources Committee, warned against this de-linkage in 2012. In fact, the requirement for a permanent disposal repository being opened and ***operating*** was, and still is, essential and foundational in the Nuclear Waste Policy Act of 1983, as Amended, the benchmark law on commercial irradiated nuclear fuel and highly radioactive waste management. This was, and still is, a safeguard against interim storage sites becoming *de facto* permanent, surface “disposal,” or “parking lot dumps.”

Note that linkage requires an *operating* repository, not just a licensed one, nor just a proposed one by someone, for someday, somewhere, some way. Remarkably, current DOE (U.S. Department of Energy) projections for the opening of a permanent burial dump are by 2048 at the very earliest, 30 years from now, although they don’t know who, where, or how!

2048 is 106 years after Enrico Fermi generated the first cupful of high-level radioactive waste of the Atomic Age, in his Chicago Pile-1 (CP-1) at the University of Chicago squash court under the football stadium, on Dec. 2, 1942 as part of the Manhattan Project race for the atomic bomb; 2048 is 91 years after the first so-called civilian, or commercial, irradiated nuclear fuel was generated, at the Shippingport atomic reactor near Pittsburgh, PA. Such remarkable delays in high-level radioactive waste management and disposal are another red flag, warning about WCS’s and/or Holtec/ELEA’s CIS facilities/MRS sites, becoming long-term, or even *de facto* permanent, surface storage parking lot dumps.

For more info., please contact Kevin Kamps, Beyond Nuclear’s Radioactive Waste Specialist, at kevin@beyondnuclear.org. Learn more about radioactive waste issues at the various sub-sections of Beyond Nuclear’s website, at: <http://www.beyondnuclear.org/radioactive-waste/>

As of: 5/22/18 2:04 PM Received: May 11, 2018 Status: Pending_Post Tracking No. 1k2-9338-m4w6 Comments Due: May 29, 2018 Submission Type: Web
--

PUBLIC SUBMISSION

Docket: NRC-2018-0052
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-0068
Comment on FR Doc # 2018-06398

SUNSI Review Complete
Template = ADM-013
E-RIDS=ADM-03
ADD= Anntoinette Walker-
Smith Jill Caverly (JSC1)

Submitter Information

Name: Kevin Kamps
Address:
Beyond Nuclear, Suite 400
6930 Carroll Avenue, Suite 400
Takoma Park, MD, 20912
Email: kevin@beyondnuclear.org

COMMENT #78
PUBLICATION DATE:
3/30/2018
CITATION: 83 FR 13802

General Comment

See attached file(s)

Re: Docket ID NRC20180052
Submitted by Kevin Kamps, Radioactive Waste Specialist, Beyond Nuclear, May 11, 2018

Public Comment re: Risk of De Facto Permanent, Surface Storage, Parking Lot Dumps

Attachments

5 11 18 Risk of De Facto Permanent Surface Storage Parking Lot Dumps as posted at Regulations dot gov