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ADD= Anntoinette Walker-Smith Jill Caverly (JSC1)

Submitter Information

Name: Geri Collecchia
Address:
2011 N Ocean Blvd Unit 705N
Fort Lauderdale, FL, 33305
Email: gericolle@aol.com

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General Comment

What if so-called interim surface storage (for only 40 years, which is already a long time, in most peoples 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 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. In its Feb. 2002 Final Environmental Impact Statement 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 long time periods, 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. No matter where such catastrophic radioactivity releases would occur at reactor sites across the U.S., or along the TX/NM borderlands they would be equally unacceptable, and must be prevented at all costs!

What if future replacements for todays 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 (its 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 half-way 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 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 80,000 metric tons of commercial irradiated nuclear fuel in the U.S., so Holtec/ELEA and WCS could accommodate twice that amount (enough capacity to stored additional highly radioactive irradiated nuclear fuel wastes generated by U.S. atomic reactors for decades to come!), if both opened and operated!

The two proposed CISFs/MRSs are located just 38 miles apart. In a real sense, this is a single proposal. In fact, Holtec CEO Kris Singh said at a 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 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, contained in highly radioactive irradiated nuclear fuel waste, too.

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 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 99 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 WCSs and/or Holtec/ELEAs CIS facilities becoming long-term, or even de facto permanent, surface storage parking lot dumps.