

## **ADMRegs-Holtec-CISFEISCEm Resource**

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**From:** ADMRegs-Holtec-CISFEIS Resource  
**Sent:** Thursday, May 24, 2018 11:19 AM  
**To:** ADMRegs-Holtec-CISFEISCEm Resource  
**Subject:** COMMENT #87  
**Attachments:** NRC-2018-0052-DRAFT-0079 #87 ATTACHMENT.pdf; NRC-2018-0052-DRAFT-0079 #87.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 18, 2018

**Public Comments Re: We Do Not Consent!**

**THE RUSH JOB TO DE FACTO PERMANENT SURFACE STORAGE "PARKING LOT DUMPS," FOR ALL THE WRONG REASONS:** We do not consent to Holtec International/Eddy-Lea Energy Alliance, the rest of the nuclear power industry, the U.S. Nuclear Regulatory Commission (NRC), and the U.S. Dept. of Energy (DOE), rushing into *de facto* permanent surface storage "parking lot dumps" (so-called "centralized" or "consolidated interim storage facilities," CISFs, a.k.a. Monitored Retrievable Storage sites, or MRS), in order to expedite the transfer of title, liability, and interim storage costs, from the nuclear utilities that profited from the generation of highly radioactive wastes, onto the backs of taxpayers and/or ratepayers.

**FLOATING FUKUSHIMAS ON SURFACE WATERS:** We do not consent to radioactive waste barge shipments on the lakes and rivers of this country, the fresh drinking water supply for countless millions, nor on the seacoasts. In addition to a disastrous radioactive release if the shipping container is breached, infiltrating water could spark a nuclear chain reaction, if a critical mass forms, due to the fissile U-235 and Pu-239 still present in the waste. (Rail-sized cask shipments bound for Holtec/ELEA, NM, weighing more than 100 metric tons, cannot travel by Legal Weight Truck (LWT) down interstate highways; high-risk barge shipment, for cask transfer onto a train, from some two dozen U.S. atomic reactors lacking direct rail access, to the nearest railhead, is an option that has long been considered.)

**MOBILE CHERNOBYLS/DIRTY BOMBS ON WHEELS:** We do not consent to highly radioactive waste truck and train shipments through the heart of major population centers; through the agricultural heartland; on, over, or alongside the drinking water supplies of our nation. Whether due to high-speed crashes, heavy crushing loads, high-temperature/long duration fires, falls from a great height, underwater submersions, collapsing transport infrastructure, or intentional attack with powerful or sophisticated explosives, such as anti-tank missiles or shaped charges, highly radioactive waste shipments, if breached, could unleash catastrophic amounts of hazardous radioactivity into the environment. (Heavy haul truck shipments – monster puller truck up front, and perhaps even pusher truck in back, with hundreds of wheels on the trailer in between, would be an alternative to barge shipments; Holtec has indicated it can accommodate any and all cask models at its CISF, meaning that smaller cask LWT shipments, down interstate highways, could still be in play, as well.)

**ENVIRONMENTAL INJUSTICE/RADIOACTIVE RACISM:** We do not consent to the targeting, yet again, of low-income, and/or people of color communities, with highly radioactive waste *de facto* permanent surface storage "parking lot dumps." It is most ironic that President Obama's Blue Ribbon Commission on America's Nuclear Future (BRC, whose recommendation for CISFs as a top priority, Holtec/ELEA cites), and his DOE, yet again explicitly targeted Native Americans. Obama honored Sauk and Fox environmental activist Grace Thorpe for defending her reservation in Oklahoma against a "parking lot dump," and then assisting allies at dozens of other reservations being targeted by DOE's Nuclear Waste Negotiator. Obama praised Thorpe as a "Woman Taking the Lead to Save Our Planet," alongside the likes of Rachel Carson of *Silent Spring* fame, in his March 2009 Women's History Month proclamation. (Similarly, Yucca Mountain, Nevada is Western Shoshone Indian land, as the U.S. government acknowledged by signing a treaty. In addition, Yucca is not scientifically

suitable. It is an active earthquake zone, a volcanic zone, and water-saturated underground. If waste is ever buried there, it will leak massively into the environment. And the State of Nevada has never consented to becoming the country's high-level radioactive waste dump.) This round of CISF schemes has targeted the s.e. NM/w. TX borderlands, communities with very large Hispanic populations, already heavily polluted by widespread fossil fuel and even nuclear industries. Holtec's CISF would contribute significantly to these "nuclear sacrifice zone" radioactive risk impacts to health, safety, and the environment. Environmental justice (EJ) demands the Holtec/ELEA CISF be stopped.

**SITES CURRENTLY AT THE VERY TOP OF THE TARGET LIST FOR *DE FACTO* PERMANENT SURFACE STORAGE "PARKING LOT DUMPS":**

We do not consent to the targeting of nuclear power plants, radioactive waste dumps, or DOE sites, already heavily contaminated with radioactivity and burdened with highly radioactive waste, to become "parking lot dumps" for the importation of other sites' or reactors' wastes. DOE, NRC, and industry's current top target is Holtec/ELEA, NM, located just 38 miles from Waste Control Specialists in Andrews County, TX, right on the stateline at Eunice, NM, currently the second top target for a CISF. WCS, already a national "low-level" radioactive waste dump, is immediately adjacent to the uranium enrichment facility in Eunice; DOE's Waste Isolation Pilot Plant is very near the Holtec/ELEA CISF site. Such disproportionately large "nuclear sacrifice zone" impacts in this concentrated area represent bad enough EJ violations; the Holtec/ELEA and WCS CISFs would compound these environmental justice (EJ) violations significantly.

**RISKS OF HIGHLY RADIOACTIVE WASTE STORAGE POOLS, AND NEED FOR HARDENED ON-SITE STORAGE (HOSS):**

As confirmed multiple times by the U.S. National Academies of Science, and researchers such as Princeton U.'s Von Hippel and Schoepfner, irradiated nuclear fuel storage pools at reactors across the country, are at risk of fires that could unleash catastrophic amounts of hazardous Cesium-137 into the environment over a wide region. Since 2002, a coalition of hundreds of environmental and public interest groups, representing all 50 states, has called for expedited transfer of highly radioactive waste, from vulnerable pools, into hardened dry casks, designed and built to last not decades but centuries, without leaking, safeguarded against accidents and natural disasters, and secured against attack. This hardened on-site storage (HOSS) should be done as close to the point of origin as possible. The rush job to construct and open CISFs such as Holtec/ELEA's, while such pool risks persist, shows that the nuclear power industry and agencies like NRC and DOE have their priorities upside down.

**NUCLEAR POWER AND HIGHLY RADIOACTIVE WASTE GENERATION:** The mountain of radioactive waste in the U.S. has grown 75 years high, and we still don't know what to do with the first cupful. Radioactive waste may well prove to be a "trans-solutional" problem, one created by humans, but beyond our ability to solve. The only safe, sound solution for radioactive waste is to not make it in the first place. Reactors should be permanently shut down, to stop the generation of highly radioactive waste for which we have no good solution.

*Prepared by Kevin Kamps, Radioactive Waste Specialist at Beyond Nuclear, on May 18, 2018 (adapted and updated from the May 28, 2016 two-pager prepared by Kevin Kamps for use in the DOE "Consent-Based Siting" proceeding). For additional information, contact Kevin at [kevin@beyondnuclear.org](mailto:kevin@beyondnuclear.org), or see <http://www.beyondnuclear.org/radioactive-waste/>.*

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# 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

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## General Comment

Re: "Docket ID NRC-2018-0052"

Submitted by Kevin Kamps, Radioactive Waste Specialist, Beyond Nuclear, May 18, 2018

Public Comments Re: We Do Not Consent! (Two Page Version)

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## Attachments

5 18 18 Two Page Version We Do Not Consent

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

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