

ADMRegs-Holtec-CISFEISCEm Resource

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General Comment

My name is Martin Kral and this comment is more for the people of New Mexico reading these comments than the NRC personnel.

Holtec International was one of several early developers of leak proof canisters to store the unused solid fuel rod assemblies in. These canisters were than place in concrete and steel canisters/cask for long term storage above ground on concrete pads at every nuclear power plant site. Holtec and others have been transporting and storing spent nuclear fuel for over 30 years. Sandia Labs in New Mexico has tested the canister designs and cask designs at the Nevada Test Site against every possible condition to try to break the seal on these containers, which included the airplane/missile test. This is the very reason there have been no commercial transport or storage incidents in the US.

Unfortunately, the same cannot be said for the DOE's handling of nuclear waste (not SNF) where two incidents of leakage occurred in 2014 at WIPP in NM and 2017 at INL in Idaho. In both cases a small amount of radioactive actinides were released into the atmosphere, less than your standard x-ray at your doctor's office or your dentist. Over 12,000 shipments of DOE transuranic waste has already passed through Roswell from DOE sites across the US to the WIPP facility near Carlsbad, NM without a single transport incident. The transport truck driver is a rare breed because they cannot have any traffic violations and never used any illegal drugs, ever. The trucks are GPS monitored and on every trip, the driver has to stop and walk around his/her rig every 100 miles to inspect and exercise their attentiveness for driving the next 100 miles. No other transport industry takes this kind of caution, especially the oil industry. The nuclear transport 'unit train' has a very similar concept of caution that you will never see with an oil train coming though Roswell today. You

will though, hear excessive train whistles with every train passing through and as Martha would say "this is a good thing".

There is over 100,000 tons of SNF all over the country costing the Federal Government billions of dollars annually to store and secure with replicated systems and procedures that could be centralized here in New Mexico with most of those dollars fueling the New Mexico annual budget instead.

I would prefer the Holtec Hi-Store CIS in New Mexico over the competitive site at WCS in West Texas.