

ADMRegs-Holtec-CISFEISCEm Resource

From: ADMRegs-Holtec-CISFEIS Resource
Sent: Friday, May 25, 2018 7:11 AM
To: ADMRegs-Holtec-CISFEISCEm Resource
Subject: COMMENT 102
Attachments: NRC-2018-0052-DRAFT-0106 #102.pdf

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

As of: 5/25/18 7:03 AM Received: May 23, 2018 Status: Pending_Post Tracking No. 1k2-93as-3ihq Comments Due: May 29, 2018 Submission Type: Web
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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

Document: NRC-2018-0052-DRAFT-0106

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

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COMMENT (#102)
PUBLICATION DATE:
3/30/2018
CITATION: 83 FR 13802

General Comment

Dear NRC Representative,

I am a professional geoscientist currently working in the mineral exploration industry and a concerned citizen of the city of Roswell. I would like to bring to your attention two issues that I believe have not been adequately addressed in the current scope of the EIS.

1). Holtec has not attained a "Social Licence to Operate" in this region.

The concept of a Social Licence to Operate (SLO) is well understood within the mining industry, and extends to any industry or practice where there is a necessity to mitigate social risk within the communities which they operate.

Jong and Humphreys (2016) define it as such: "A SLO is an informal, implicit and ongoing permission granted to a business to engage in economic development or the extraction of natural resources. It is a form of bargain between a business corporation and one or more social groups, often including one or more communities. The SLO includes the conditions under which social groups and communities grant permission, and these conditions may change over time (Pike, 2012). The social licence has to be earned and then maintained, as it reflects the quality of a relationship that may change over time (Thomson, 2012). A SLO has been described as 'intangible, informal, non-permanent and dynamic' (Thomson, 2012). In order to obtain a SLO businesses should demonstrate respect for human rights, avoid corruption and take steps to minimize environmental harm (Bice, 2014)"

I do not believe that Holtec International has earned their SLO from the communities of Southeastern New Mexico. I implore the NRC to extend the scope of the impact study to include an assessment of the social risk involved with the proposed Holtec site. Many citizens of this region, including myself, hold interest in the dairy, oil and gas, and pecan farming industries, all of which would be negatively impacted by any sort of "incident". It seems apparent from attending the public comment meeting in Roswell that the communities of this area do not consent to Holtec International proposal.

2). The Permian Basin is geologically unsettled.

The Permian Basin is not as geologically stable as Holtec International claims it to be.

Kim & Lu (2018) have published a study revealing substantial ground subsidence within the Permian Basin. Some locales indicated vertical displacement as great as 40 cms in one year. Zu states in an interview with the online publication Shale Daily: "The ground movement we're seeing is not normal... These hazards represent a danger to residents, roads, railroads, levees, dams, and oil and gas pipelines, as well as potential pollution of groundwater."

Kim and Lu also state that "The rapid sinking is most likely caused by water leaking through abandoned wells into the Salado formation and dissolving salt layers, threatening possible ground collapse," and go on to say that, "...human activities of fluid (saltwater, carbon dioxide) injection for stimulation of hydrocarbon production, salt dissolution in abandoned oil facilities, and hydrocarbon extraction, each have negative impacts on the ground surface and infrastructures, including possible induced seismicity." Indeed, Increased seismic activity linked to horizontal drilling practices has been reported in the Permian Basin within the last year by Jens-Erik Lund Snee and Mark D. Zoback (2018).

This is no matter to be taken lightly when considering an interim facility for storing high-grade nuclear waste. I implore the NRC to work with whatever entities necessary to conduct a thorough investigation into the seismic, geologic and geomorphological stability of the region surrounding the proposed Holtec site.

It is my sincere hope that you will incorporate these issues into the scope of your EIS. I am putting my trust in YOU to do right by the people of New Mexico and the environment. Our livelihoods and that of all future generations depend on it.

Thank you.

Jordan P. Toles

Your reading assignments:

Jin-Woo Kim & Zhong Lu (2018). "Association between localized geohazards in West Texas and human activities, recognized by Sentinel-1A/B satellite radar imagery." Scientific Reports, volume 8, Article number:

4727

Jens-Erik Lund Snee and Mark D. Zoback (2018). "State of stress in the Permian Basin, Texas and New Mexico: Implications for induced seismicity." *The Leading Edge*, 37(2), 127-134.