

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

---

**From:** ADMRegs-Holtec-CISFEIS Resource  
**Sent:** Friday, May 25, 2018 7:52 AM  
**To:** ADMRegs-Holtec-CISFEISCEm Resource  
**Subject:** COMMENT 107  
**Attachments:** NRC-2018-0052-DRAFT-0111 # 107.pdf

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

<b>As of:</b> 5/25/18 7:48 AM <b>Received:</b> May 24, 2018 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1k2-93bx-ehr0 <b>Comments Due:</b> May 29, 2018 <b>Submission Type:</b> 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-0111  
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:** MARI MENNEL-BELL

**Address:**

1524 Bayview Drive  
Ft Lauderdale, FL, 33304-1627

**Email:** mari471@aol.com

**COMMENT (#107)**  
**PUBLICATION DATE:**  
**3/30/2018**  
**CITATION: 83 FR 13802**

---

## General Comment

I am absolutely AGAINST against Holtec International/Eddy-Lea [Counties] Energy Alliance's proposed centralized interim storage facility (CISF) for 173,600 metric tons of highly radioactive irradiated nuclear fuel, targeted at southeastern New Mexico!

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 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 2 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.