

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

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# PUBLIC SUBMISSION

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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

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.

As confirmed multiple times by the U.S. National Academies of Science, and researchers such as Princeton U.'s Von Hippel and Schoeppner, 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.

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.

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.)

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.)

In addition, the Yucca site 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.