

Holtec-CISFEISCEm Resource

From: Dennis Romero <dennis.a.romero1@gmail.com>
Sent: Tuesday, May 29, 2018 6:54 PM
To: Holtec-CISFEIS Resource
Cc: Caverly, Jill
Subject: [External_Sender] Holtec International HI-STORE Consolidated Interim Storage Facility Project – EIS Scoping Public Comments [Docket No. 72-1051; NRC-2018-0052]
Attachments: Holtec CISF Public Comment.pdf

To whom it concerns:

Please find my written public comment attached.

If you have any questions about any of the points or requests I've made, please feel free to let me know.

Thank you for your time and consideration.

Sincerely,
Dennis Romero

Federal Register Notice: 83FR13802
Comment Number: 80

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DENNIS ROMERO, P.E.

612 E. Mesa Ave, Gallup, NM 87301 | dennis.a.romero1@gmail.com | (505) 489-0737

May 29, 2018

Jill Caverly (Holtec-CISFEIS@nrc.gov, Jill.Caverly@nrc.gov)

Office of Nuclear Material Safety and Safeguards

U.S. Nuclear Regulatory Commission, Washington DC 20555-0001

Subject: Holtec International HI-STORE Consolidated Interim Storage Facility Project – EIS Scoping Public Comments [Docket No. 72-1051; NRC-2018-0052]

Ms. Caverly,

I offer the following points for consideration with respect to the subject Environmental Impact Statement:

1. The scope of the EIS should include a risk assessment that includes the entire process of the movement and interim storage of spent nuclear fuel rods – movement and packaging of waste at current location(s); transport of the waste to the proposed facility; off-loading and movement of the waste into the interim storage locations; movement and packaging of the waste to a permanent repository; transport to the final waste destination; final off loading and storage of waste. The risk assessment for this proposed facility really should examine all the steps needed to move the waste to its final location. Any risk assessment should not be limited to the facility footprint, as since the application states it is an interim facility. I request that the scope of the EIS include this analysis.
2. The Holtec International Representative that spoke at the Public Meeting in the City of Gallup stated that the Lea County Facility is an interim storage location until “Yucca Mountain opens up.” The funding for the Yucca Mountain Project (YMP) has stalled and curtailed for the past several years I realize that the Nuclear Waste Policy Amendment Act (NWPAA) has recently passed the House, but YMP is not slated to open any time soon, which could possibly make the CISF much longer term than originally thought. In addition, please note that the NWPAA would set a path forward for the Department of Energy (DOE) to resume the process of planning for and building the southern Nevada site, transfer land to the DOE for it, ease the federal funding mechanism and allow DOE to build or license a temporary site to store waste while the Yucca project is being planned and built. If this is the case, I’d say that the subject facility may not be necessary. I request that the scope of the EIS consider an alternative to this proposed facility that includes the opening and operation of YMP vice opening this facility.
3. As the subject facility will be owned and operated by a private, for-profit entity, I’d like the NRC to examine the potential costs associated with the operation and maintenance (O&M), response to any accidents, and eventual facility decontamination and decommissioning (D&D) for this interim facility. Once the NRC arrives at this cost estimate, I’d ask that any potential license

DENNIS ROMERO, P.E.

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include a surety fund or bond that Holtec International signs over to the NRC or DOE, in the event that this private, for-profit company goes out of business. I request that the scope of the EIS contain a cost analysis, and any potential license require financial surety from Holtec International for O&M, D&D and accident response, in the event Holtec ceases to exist.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Romero", with a large, sweeping flourish extending to the right.

Dennis Romero, P.E.