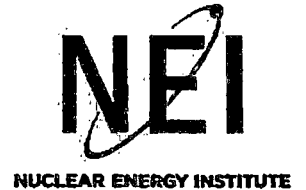


**RODNEY MCCULLUM**  
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ADD= Anntoinette Walker-  
Smith, Jill Caverly (JSC1)



May 29, 2018

May Ma  
Chief, Program Management, Announcements, and Editing Branch  
Office of Administration, MS TWFN-7-A60M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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**Subject:** Holtec International HI-STORE Consolidated Interim Storage Facility Project: Comments of Nuclear Energy Institute on Scoping for NRC's NEPA Review Process (NRC-2018-0052)

Ms. Ma:

The Nuclear Energy Institute (NEI)<sup>1</sup> is pleased to provide scoping comments to the Nuclear Regulatory Commission regarding Docket No. 72-1051; NRC-2018-0052, Holtec International's HI-STORE Consolidated Interim Storage Facility Project.

NEI has a longstanding policy of supporting the development of a consolidated used nuclear fuel storage facility in parallel with completion the Nuclear Regulatory Commission's (NRC) review of the Yucca Mountain repository license application. Therefore, we welcome the NRC's ongoing environmental review of this project.

In preparing the Draft Environmental Impact Statement (DEIS) regarding this project, the NRC is tasked with meeting the precepts of the National Environmental Policy Act (NEPA), the purposes of which are to declare a policy:

*[W]hich will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation.*

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<sup>1</sup> The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

Ms. May Ma  
May 25, 2018  
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Responsible, well-planned consolidated interim storage of used nuclear fuel – as proposed by this project – fits firmly into what Congress had in mind when it sought the balance of “enjoyable harmony between man and his environment.”

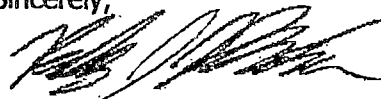
The purpose and need of this project are straightforward: to provide a safe, retrievable storage facility where nuclear materials currently stored at numerous installations across the country can be consolidated into one suitable location, in preparation for future relocation to a final repository. To that end, we respectfully submit the following for your consideration:

- Holtec’s HI–STORE Consolidated Interim Storage Facility Project is essentially a larger version of an independent spent fuel storage installation, of which there are 79 currently operating successfully in 34 states. Working with the NRC as the regulator, the nuclear industry has a long history of properly designing and building facilities that safely and securely store used fuel.
- We understand that, during this scoping process, the NRC already has received requests to dramatically expand the breadth and scope of the NEPA process and the DEIS beyond what is appropriate under NEPA. We strongly recommend the agency resist those entreaties. Doing so would simply delay the nation’s efforts to address used nuclear fuel storage, while providing no meaningful additional protection of human health and the environment. Further, the NRC licensing/permitting process already has numerous built in redundancies that provide added assurances that environmental resources, as well as safety, will be protected.
- We also understand that, in addition to analyzing environmental impacts, the DEIS will conduct a close review of the socio-economic impacts of the project. Development of this facility will provide many socio-economic benefits, not only at and around the New Mexico site, but also in the communities from which used fuel will be removed. Relocation of used fuel will allow communities to redevelop the reclaimed areas where fuel is currently stored.

In conclusion, we believe that this project is in the long-term best interest of the United States as a nation, the Eddy-Lee region of New Mexico, and the communities from where currently stored fuel will be removed. As such, it is an important U.S. infrastructure project that requires predictable licensing, and therefore we urge you to proceed in a timely fashion by establishing and adhering to a reasonable schedule.

We thank you for this opportunity to provide comments.

Sincerely,



Rodney McCullum

C: Joy Russell, Holtec International