

Resource Management Services LLC

Kirk L. and Tamara E. Gadzia • P.O. Box 1100 • Bernalillo, NM 87004 • Phone 505-263-8677 •
kirk@rmsgadzia.com tamarag@rmsgadzia.com

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Re: Docket ID NRC-2018-0052 Holtec International's HI-STORE Consolidated Interim Storage Facility Project for Spent Nuclear Fuel in Lea County, New Mexico

Dear NRC Representative:

As 40-year residents of New Mexico we are deeply concerned about the potential negative impacts of Holtec International's controversial plan to "store" up to 100,000 tons of high level dangerous nuclear reactor waste in our state. I work across the state and internationally in the field of livestock production. The livestock and livestock product industry are one of the largest in New Mexico producing over \$7 billion in revenues annually. We believe New Mexico's vital agricultural interests will be negatively impacted by this plan. My wife Tamara has also worked across the state in land restoration with Quivira Coalition and other non-profit organizations dedicated to restoring watershed health in degraded ecosystems. We both hold Masters of Science degrees in Range Management and Biology respectively.

For the sake of brevity and clarity we have bulleted some of our other main concerns below.

- This plan would create multiple targets for terrorism including storage location, transportation routes, and transportation vehicles. No plan is in place to deal with this threat and it will be very costly to implement an effective plan.
- More than 10,000 rail cars of this risky waste would rumble on New Mexico rails, in a process that would take 20 years, likely travelling along I-40, and I-25 to Carlsbad. Each loaded car would weigh at least 33% more than the tracks are designed to carry. Each rail car would carry more deadly plutonium than was in the bomb dropped on Nagasaki. This creates a very high likelihood of an accident with disastrous consequences.
- A massive sinkhole has developed near Carlsbad right by the railroad tracks. The current estimate to stabilize this sinkhole is \$45 million, with costs rising as the sinkhole increases. It makes no sense to transport nuclear waste on overloaded tracks along this route when there have been seven accidents on the railroads in New Mexico in just the last three years.
- This transportation risk and terrorism threat not only affects New Mexico but all the other states and communities whose rail routes would bring this nuclear waste to our state. These wastes need to remain in the places where they were created and not generate additional safety hazards for New Mexico and all the other states who did not produce this waste.

- Our state proudly calls itself the "Land of Enchantment" because of its natural beauty and clean environment. The nation's perception of our state will be damaged beyond repair if this plan is approved and implemented. Does the "Land of Nuclear Waste" sound appealing?
- This plan could devastate an already fragile New Mexico economy with losses from tourism, oil and gas, agriculture, movie and social media industries. These losses will not ever come close to being compensated by the creation of a mere 55 jobs with Holtec's plan.
- Having a nuclear waste facility located between Carlsbad and Hobbs could decimate local communities and their economies dependent on tourism to Carlsbad Caverns National park, Guadalupe Mountains National Park and New Mexico state parks. In 2016, Carlsbad Caverns tourism generated 33.8 million dollars and provided 444 local jobs. In 2017, 520,026 people (up from 466,773 in 2016) visited Carlsbad Caverns National Park. Not to mention the affect a nuclear waste accident could have on the cavern's bat population. Local agriculture depends on those bats for insect control!
- The irradiated fuel rods would be stored above ground and contained in thin steel canisters, later surrounded by cement. Most existing low-level radioactive waste sites have leaked, with remediation costs running into the billions of dollars. Congress has failed to ever appropriate enough money to clean them up.
- The proposed Yucca Mountain nuclear waste storage site in Nevada was the subject of intense research and debate from 1987 till 2009 when it was withdrawn from consideration as a viable long-term storage site. Why hasn't such a research and public information and comment period been put forward for the site proposed in New Mexico? It has no less risks than Yucca Mountain and has not been given the review necessary to viably determine its feasibility from any standpoint.
- New Mexico is home to the fourth largest Native American population in the U.S. These people have lived here for centuries before European settlement and have always urged planners to think 7 Generations ahead. The greatly diminished legacy and options we leave future generations if we bring the nations nuclear waste to New Mexico are not worth the gain some corporation will get if its plan is approved.

We have numerous other concerns and are frankly both in disbelief that this plan has been put forward with so little opportunity for public input. This plan attempts to basically destroy New Mexico with imported nuclear waste. It seems like this plan is about the money for one small company with no concern for the health and safety of New Mexico's people, land and culture. This plan should be stopped NOW. Just say NO to Holtec.

With greatest concern,



Kirk L. and Tamara E. Gadzia