



**Comments re Docket No. 72-1051; NRC-2018-0052
Holtec International HI-STORE Consolidated Interim Storage Facility Project**

The League of Women Voters of New Mexico is concerned about the lack of clear information in the Holtec International application to build a consolidated spent nuclear fuel repository in southeastern New Mexico. There are a number of issues on which we would like to have more specific information. We would like to know:

1. What are the precise rail routes that are proposed for transport of the waste and what are the specific standards for those railbeds?
2. Is there current discussion with the privately-owned rail companies about their willingness to make needed improvements?
3. What track inspection regime would the U.S. Department of Transportation use to assure the rail routes meet the required standards?
4. The actual weight of the transport canisters and whether impact bumpers would be used to reduce the possibility of human and/or wildlife to radiation as the result of a transport accident.
5. What are the estimated costs of packaging, transporting and storing the fuel in New Mexico?
6. Please clarify who will actually have title to the fuel. If individual utilities retain title to the fuel, what happens in case of bankruptcy of the company?
7. Detailed information about how the company proposes to monitor the site for leakage of the fuel containers and possible dispersal into groundwater.
8. We need more information about security of the site against theft of the fuel.
9. The options the state of New Mexico has if the fuel is transported here and the U.S. government decides it will be a permanent storage site.

We realize that many of these questions are the responsibility of the U.S. Department of Transportation, but cooperation with that department is critical to this application. At this point we are not aware of any efforts by the U.S. Department of Transportation or the New Mexico

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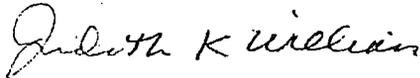
Department of Transportation to directly address transportation questions about the fuel. We request a future round of public meetings that involve all governmental entities so that questions involving transportation, environmental impact and physical security of the spent nuclear fuel can be addressed.

We do expect the NRC to make cost estimates as part of your process.

We are also concerned about the amount of "propriety information" that has been withheld from public view in the application.

We would greatly appreciate a response to our comments.

Sincerely,

A handwritten signature in cursive script that reads "Judith K. Williams".

Judith Williams, Ph.D., President
League of Women Voters of New Mexico