

**As of:** 5/24/18 10:31 AM  
**Received:** May 19, 2018  
**Status:** Pending\_Post  
**Tracking No.** 1k2-938g-ojvx  
**Comments Due:** May 29, 2018  
**Submission Type:** Web

# PUBLIC SUBMISSION

**Docket:** NRC-2018-0052

Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Comment On:** NRC-2018-0052-0001

Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Document:** NRC-2018-0052-DRAFT-0080

Comment on FR Doc # 2018-06398

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## Submitter Information

**Name:** Jack Borninski

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## General Comment

See attached file.

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## Attachments

JWB comments, submitted

**SUNSI Review Complete**

**Template = ADM-013**

**E-RIDS=ADM-03**

**ADD= Anntoinette Walker-Smith, Jill**

**Caverly (JSC1)**

**COMMENT (#88)**

**PUBLICATION DATE: 3/30/2018**

**CITATION: 83 FR 13802**

## **Jack Borninski's comments on the Holtec Hi-Store CISF**

**NRC docket # NRC-2018-0052**

### **Format of scoping meetings**

About 80% of comments given at the scoping meetings are irrelevant to the issue at hand. It is irrelevant if one is a lifelong area resident, that one has four grandchildren, that WIPP may be a wonderful place to work at, etc (the NRC knows that this is not a local but a national issue, with impact on many states coast-to-coast). These comments serve no useful purpose, and result in delaying and diluting the relevant issues, discouraging speakers with relevant issues to present, and making the meetings last past 11PM !!!???

All these irrelevant comments should be discarded by the NRC. The NRC should put out a list of relevant issues for the scoping meetings, and disallow any comments that fall outside of this list.

Of the about 20% relevant comments made at the meetings (site monitoring, etc), some commenters disclosed their bias by stating their position either for or against this Holtec project. Such comments must also be rejected by the NRC for being tainted by bias one way or another, and for likely being driven by political motivations rather than by unbiased analysis.

In fact, it would be very risky for the NRC not to reject such biased views, as this could lead to the licensing of this CISF based on politics, and might result in a calamity if politics trump the critical safety issues. This project is a critical national infrastructure, and too significant to be driven by politics such as "the economic benefits in the region" (especially that these benefits are small in the region, and they are neutral nationwide regardless of which alternative is selected).

### **Technical issues**

This Holtec CISF is a technical/engineering project, and not a social science project. Whether or not the safety requirements of this project are met will be determined by the resolution of the relevant technical issues.

As in any technical project of this impact and magnitude, comprehensive design tradeoffs, risk assessment and mitigation, failure mode analysis, cost estimation, financial and business information must be done and shown by the proposers. Based on the Holtec documents, some of these issues have not been addressed, as follows.

- The Holtec decommissioning plan that outlines what needs to be done to leave the CISF site clean for unrestricted use is thin on specifics about how it is to be done, who is going to pay for it, and how much.
- In its environmental report Holtec addresses some potential CISF failures caused by environmental effects, but it fails to address any potential man-made failures (intentional and unintentional). Holtec addresses potential failures during the CISF commissioning and operation, but fails to address potential failures during

decommissioning. Holtec does not state who is going to pay to mitigate the effects of all these potential failures.

- In its costs-benefits analysis Holtec does not address the possibility of transferring the stranded SNF to nearest operating reactor sites, to reduce the costs of the No-Action alternative (and to reduce the benefits of the Holtec-CISF alternative).
- In its costs-benefits analysis Holtec does not address the property tax incentives and/or abatements given to its CISF, and resulting in the decreased local property tax revenues.
- The CISF's impact on the widely used BLM's Hackberry Lake recreational area, including its environmentally-unique Hackberry Lake sand dunes complex, located within 10 miles of the proposed site is not addressed at all in the Holtec environmental report (despite Holtec saying it examined a 50 mile radius).
- For a given weapon CEP, the Holtec square Hi-Storm Umax array maximizes the canister hit probability (this applies to canisters stored below or above ground). Holtec should look at some other arrangements that minimize this hit probability, such as a linear array or a circular array.
- There is no clear statement about how much this whole CISF project will cost, where the money is coming from, and who will absorb the cost overruns. There is no statement on the public funds used in this project, how much, and for what purpose. This factors into choosing between the No-Action and the Holtec-CISF alternatives.

By definition the probability of an accident and release of airborne/waterborne contamination increases if the nuclear waste were to be moved rather than staying in place where it is now (due to the additional risks at transportation). What is not clear is by how much this probability increases. This factors into making the choice between the distributed on-site storage versus the centralized CISF storage (between the No-Action and the Holtec-CISF alternatives).

Simple analysis for the two cases of the waste staying on-site in distributed storage versus the waste being transported cross-country to the centralized CISF storage shows a factor of ten or so increase in this accident/contamination probability if the waste is moved, with the transportation risks dominating the result. This analysis is based on the assumed models for the probability of accidents/contamination while in storage and while in transportation, which may or may not be as accurate as the NRC models.

The NRC (not Holtec) should run a more comprehensive probability analysis of this distributed versus centralized waste storage issue, calculating the probabilities of contamination if the waste is not moved versus moved, using its own accurate statistical models including the cross-country transportation risks model. This is different from the probability of people being irradiated to certain mrem, and it is an extension of what's in NUREG-1864.

This NRC analysis and its results should be made available for public review, to aid in the Holtec CISF licensing process. These results should be given numerically, as opposed to statements contained in the Holtec documents such as "very low probability", etc.