

ADMRegs-Holtec-CISFEISCEm Resource

From: ADMRegs-Holtec-CISFEIS Resource
Sent: Friday, June 8, 2018 6:43 AM
To: ADMRegs-Holtec-CISFEISCEm Resource
Subject: HOLTEC DRAFT-0128 #138
Attachments: NRC-2018-0052-DRAFT-0128 #138.pdf

Holtec CISF
FDMS Comment Number:
DOCKET ID: NRC-2018-0052
83-FR-13802

PUBLIC SUBMISSION

As of: 6/6/18 1:52 PM Received: May 31, 2018 Status: Pending_Post Tracking No. 1k2-93gn-ub1d Comments Due: July 30, 2018 Submission Type: Web
--

Docket: NRC-2018-0052

Holtec International HI-STORE Consolidated Interim Storage Facility Project

Comment On: NRC-2018-0052-0058

Holtec International HI-STORE Consolidated Interim Storage Facility Project

Document: NRC-2018-0052-DRAFT-0128

Comment on FR Doc # 2018-10418

SUNSI Review Complete
 Template = ADM-013
 E-RIDS=ADM-03
 ADD= Anntoinette Walker-
 Smith, Jill Caverly (JSC1)

Submitter Information

Name: Karl Koessel

COMMENT (#138)
 PUBLICATION DATE:
 3/30/2018
 CITATION: 83 FR 13802

General Comment

DOE even held a Consent-Based Siting public comment meeting in Chicago in 2016 so why not a Holtec/ELEA CISF one now?

Why is it that NRC has scheduled only four meetings, when DOE scheduled six times as many during the Yucca proceeding? Why has NRC scheduled meetings in only two states, when DOE scheduled meetings in nearly two-dozen states?

Even DOEs two-dozen meetings were not adequate. After all, Yucca-bound shipments of highly radioactive waste are projected to travel through 44 states plus the District of Columbia. Few states in the Lower 48 would be spared the very high risks of such truck, train, and/or barge shipments bound for Nevada.

But the Holtec/ELEA proposal is significantly larger than even the Yucca scheme. Yucca was and is limited by law to a grand total of 70,000 metric tons of highly radioactive waste. Only 63,000 metric tons of that figure (90% of the overall limit) could be commercial irradiated nuclear fuel. (The other 10% would be DOE irradiated nuclear fuel and high-level radioactive waste, as from research and overseas reactors, and vitrified military reprocessing wastes.)

But Holtec/ELEA has proposed 100,000+ metric tons of commercial irradiated nuclear fuel. Holtec/ELEA used to cite the figure of 120,000 metric tons. But in fact, if you multiply the first phase of 8,680 metric tons of uranium -- as described in NRC's March 30, 2018 Federal Register Notice -- by 20 phases, over 20 years, as Holtec proposes, that would mean not 100,000, nor 120,000, but rather 173,000 metric tons of commercial

irradiated nuclear fuel!

Clearly, Holtec/ELEAs CISF plans are much bigger than even the amount of highly radioactive waste targeted at Nevada for permanent burial. Thus, the shipping impacts would also be significantly larger. Instead of 12,145 trucks and trains bound for Nevada through 44 states plus Washington, D.C., a significantly greater number bound for NM can be expected, if Holtec/ELEA gets its way.

For this reason, NRC must hold public comment meetings in at least as many states as DOE did for its Yucca scheme. Major cities that can expect NM-bound road and/or rail shipments would include: Atlanta; Boston; Chicago; Cleveland; Dallas/Forth Worth; Detroit; Houston; Kansas City; Los Angeles; Miami; Minneapolis/Saint Paul; Nashville; New York/Newark; Omaha; Philadelphia; Pittsburgh; Saint Louis; and Tampa.

Why isnt NRC holding meetings in these cities, given such transport risk impacts?

Why isnt NRC holding meetings in the following additional port cities, given the potential for first leg barge shipments that could be required, prior to cask transfer onto rail, for export to NM: Baltimore, MD; Norfolk, VA; Wilmington, DE; New Haven, CT; Jersey City, NJ; Milwaukee, WI; Muskegon, MI; Vicksburg, MS; Florence, AL; Oxnard, CA; and Fort Lauderdale, FL.

And last but not least, why isnt NRC holding meetings in communities where heavy haul truck first leg shipments could be required, prior to transfer of casks onto trains? As but one such example, a location in northern MI, near the Big Rock Point reactor, or the Gaylord railhead, is in order.

If LWT shipments are in fact to be a part of the Holtec/ELEA CISF transport scheme, then communities along interstate highways in most states in the Lower 48 should also be extended public comment meetings, like the one you are holding this evening, and the three you have scheduled for S.E. NM at the end of April and beginning of May.

Thank you for your consideration of my opinion.

Sincerely,

Karl Koessel