

## Holtec-CISFEISCEM Resource

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**From:** Lorien House <lorhc@earthlink.net>  
**Sent:** Thursday, June 7, 2018 12:50 PM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052; Holtec International's HI-STORE CIS Facility for Spent Nuclear Fuel, Lea County, New Mexico

I respectfully submit these scoping comments on the Holtec Environmental Report (ER) to bring up to 100,000 metric tons of spent fuel, high-level radioactive waste, from nuclear reactors around the country to southeast New Mexico. I am submitting the following comments because I DO NOT CONSENT to New Mexico becoming a national radioactive waste dumping ground. I DO NOT CONSENT to transporting up to 10,000 canisters of highly radioactive waste through thousands of communities nationwide. I DO NOT CONSENT to the risk of contamination of our lands, aquifers, air, or the health of plants and wildlife. I do not consent to endangering present and future generations.

I request that at least one scoping meeting be held in Dallas/Ft. Worth, San Antonio, and Midland, Texas since there would likely be extensive transport through these cities and that meetings be held in other major cities along transport routes throughout the country.

1. This Holtec Proposal Is Contrary to Current Law Current law only allows the U.S. Department of Energy to take title to commercial spent fuel "following commencement of operation of a repository" or at a DOE-owned and operated monitored retrievable storage facility. The Holtec site meets neither requirement, as it is a private facility.

2. Holtec Must Remove Copyrights And All Redactions in the Environmental Report NRC must require Holtec to produce an ER that has no such copyright restriction and has no redactions.

3. The Impacts Of Permanent Storage Must Be Analyzed The Environmental Report (ER) is inadequate and incomplete because it does not analyze the impacts of the spent fuel being left at the Holtec site indefinitely.

\*in truth, the proposed site is near several aquifers--in fact the region's popular tourist site--Carlsbad Caverns was formed by such a subterranean body of water. The existence of the caverns alone should indicate the kind of geology in the area--including soluble rocks, limestone, etc, which is NOT suitable for a nuclear waste site. Sinkholes are only one of the possibilities--and with nuclear waste--a sinkhole could have horrendous, devastating consequences.

\*\*Many people who live in the area are poor, Latino, or Native American. The waste and its attendant risks--both in transport and storage, disproportionately affects this population, who've already been brutalized by environmental racism for decades--in the form of toxic waste dumps, mining, uranium mining, refineries, slaughterhouses, etc, which middle and upper income communities don't want.

4. More Alternatives Must Be Analyzed

Keeping the spent fuel casks in some form of Hardened On Site Storage (HOSS) on the reactor sites must be analyzed. Thoroughly analyzed. WIPP, which was supposed to be safe for thousands of years, suffered an explosion and contamination after only 15 years in operation.

The alternative of consolidated storage being done at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) must be analyzed.

5. The Environmental Report inadequately discusses the Transportation Risks This ER must include all transportation routes and the potential impacts of accidents or terrorism incidents on public health and safety along all the routes. \*It is important to note that the transport of this waste carries its own serious and dangerous issues above and beyond storage. For example, looking at the records of oil train accidents--in 2016 alone there were 10,927 accidents, 8050 injuries, and 805 fatalities. That is for trains carrying oil. Transport carrying huge containers of nuclear waste, EACH ONE potentially containing as much cesium as was released in the infamous Chernobyl accident. I absolutely DO NOT CONSENT, as an American citizen, to allowing that kind of danger to pass through our lands and communities. It is shortsightedness of the highest order to think there will be no accidents. Just like on the Titanic, accidents happen.

The ER is inadequate and incomplete because it does not discuss how rail shipments from reactors without rail access would be accomplished and the risks and impacts of such shipments.

6. The Consequences To An Accident-Exposed Individual Must Be Analyzed Terms like “collective dose risk” and “person-rem” are used to ignore the potential impacts to a single individual. And their families.

7. Cracked And Leaking Casks Must Be Addressed The ER does not analyze exactly how radioactive waste from a cracked and leaking canister would be handled, since there is no wet pool or hot cell at the site. Quite an oversight.

8. More Cumulative Impacts Must Be Analyzed The ER mentions WIPP but does not analyze the impacts of a radiologic release from WIPP on the proposed CIS site. See above, the longterm costs of the WIPP explosion could wind up equal to those of the Three Mile Island cleanup

9. Impacts Of Future Railroads And Electric Lines Must Be Analyzed The railroads and electric lines are not in place, but must be analyzed.

10. How many of the estimated 135 jobs will go to locals?

The total number of annual workers at the site could total as many as 135 when construction jobs are combined with the operating workforce.

11. Seismic Impacts On Stored Casks Must Be Stated Although the ER gives a statement on recent seismic activity in the area, there is no analysis of what many 3.0 – 4.0 fracking-induced earthquakes will have on the buried casks. The connection between fracking and earthquakes has been documented recently. Why put nuclear waste in a fracking area????

12. The impacts of global warming on climate in the region and the resulting impacts on casks and canisters, in relation to their ratings, must be considered.

Thank you for your consideration,

Lorien House

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