

Holtec-CISFEISCEm Resource

From: Susan Tiano <stiano@unm.edu>
Sent: Monday, June 11, 2018 9:59 AM
To: Holtec-CISFEIS Resource
Cc: Susan Tiano
Subject: [External_Sender] revised letter re Holtec project
Attachments: NRC letter re Holtec project.docx

Please replace the letter I just sent you with this one, which includes the date it was written. Thank you.

Susan Tiano, Ph.D.
Professor Emerita
Department of Sociology
University of New Mexico

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Subject: [External_Sender] revised letter re Holtec project
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June 6, 2018

To: U.S. Nuclear Regulatory Commission

From: Susan Tiano, Ph.D.

Re: Holtec International Project for interim storage of spent nuclear fuel

I am writing to express my total opposition to Holtec International's plan to create an interim storage facility in southern New Mexico for our nation's spent nuclear fuel. I understand that according to federal law, before Holtec can be awarded a contract for the project, the NRC must perform an environmental impact study that demonstrates the project would not cause harm to the environment or local communities. According to the NRC's public meeting in Albuquerque in which the agency discussed the impact study, the goal is to explore a broad range of impacts, not just to the natural environment, but to the health and well-being of the populations that might be affected. Since this project would involve aggregating spent nuclear material from across the entire country and transporting it by train to southern New Mexico, where it would be stored in semi-above ground canisters for an indefinite period of time, its potential impacts transcend the local community of Carlsbad-Hobbs, where the facility would be built, to include the rest of the state, the Southwest region, and the nation as a whole. When considered in its entirety, there is very little to be gained from this project and a tremendous amount to be lost.

Here is a brief list of reasons why the Holtec project should not go forward:

1. Single site intermediate storage is a bad idea

- Concentrating so much spent fuel at a single site makes it a ready target for terrorists
- The more the material is handled to prepare it for shipment beyond the point of production, the more chance of human error
- The farther it is shipped, the more chance of transportation accidents
- Moving it twice (to intermediate and then to permanent storage) doubles the chances of human error and transportation accidents
- The poor state of U.S. rail and road infrastructure makes accidents more likely
- Intermediate storage is a bad idea when no permanent storage site is in sight or apt to emerge, if the experience of Yucca Mountain is any example
- There is so much spent fuel at nuclear power plants across the country that it could more than fill up Yucca Mountain now, so even if Yucca Mountain does come back on line, it won't be sufficient to store all the nation's spent fuel

2. Removal of spent material from point of generation is bad because it separates the costs of nuclear energy production from the benefits
 - When costs are externalized, they cannot act as a natural regulation mechanism to motivate responsible use
 - Communities are less apt to search for safer, renewal energy alternatives when they don't have to bear the costs of nuclear energy
 - Shifting the burden of nuclear storage to communities that did not benefit from the nuclear energy that was produced is inherently unjust
 - Externalizing the costs of nuclear energy distorts the free market and prevents it from self-regulation because costs and benefits are decoupled.
3. Such dangerous material, with such a long radioactive half-life, requires that socially responsible production, use, and storage be regulated through careful community planning at the national, state, and local levels.
 - The Holtec project is not part of an integrated plan; too many essential aspects such as transportation safety and the location of permanent storage have yet to be worked out
 - The Holtec project is being rushed though without adequate input from all of the communities that will be affected by it
 - Holtec's website, which states that there is uniform support for the project, denies the actual amount of community opposition; this portends a lack of community collaboration if the project goes forward
3. The proposed site in southeastern New Mexico is a bad idea
 - The geology of the area is not sufficiently stable to store the material; it is mostly sandstone and limestone, soft sedimentary rock from the time that what is now New Mexico was undersea. There is already a huge and growing sink hole near Carlsbad, close to where the project would be located, and the geologic instability is getting worse with all the hydraulic fracturing going on nearby.
 - New Mexico is far from the nuclear facilities that generated the material, most of which are on the East and West coasts, so it will have to be shipped great distances, often through large population centers. This exacerbates the transportation issues noted above. Already the Albuquerque City Council has resolved not to allow this material to be transported through our city, and many other communities are poised to follow suit.
 - New Mexico, as one of the poorest states in the nation, has a particularly inadequate rail and road infrastructure and lacks the funds to improve it. WIPP needed heavy investment (such as the Santa Fe bypass) that was only possible because it came through federal dollars and was mostly oriented to

one site (Los Alamos). Unless similar federal commitments are made to develop transportation routes across the state, the project will be very dangerous to New Mexico communities.

- Positioning the storage site so close to WIPP is a bad idea, because it increases the potential of terrorist attacks to knock out both facilities together.
 - The proposed site is quite close to the rich petroleum deposits that are bringing considerable hydraulic fracturing to the region. The long-term potential for geological destabilization in the area is so threatening that the oil and gas industry has come out against the Holtec project.
 - Our state would lose much more revenue from a decline in oil and gas production than it would receive from whatever taxes Holtec pays to the state.
4. Long term nuclear storage needs to be administered by the government rather than a private company
- To remain in business, companies such as Holtec must maintain their profit levels and prioritize the economic interests and needs of their shareholders over all other values, including community wellbeing
 - To store nuclear material with a radioactive half life of thousands of years, there must be the assurance that the agency storing it will be in operation in perpetuity, something that private companies cannot guarantee (governments can't either but the chances are better).
 - New Mexico has paid a high price when mining companies have ceased operations or gone out of business and left environmental destruction in their wake. There is no guarantee that Holtec will not do the same.

To summarize, even the most optimistic scenarios have a difficult time justifying the proposed project in the face of all these obstacles. The few jobs generated won't be that much of a boon to the region, and the rationale for single site intermediate storage is flimsy at best.