

5/22/18

5-20-, 2018

NRC-2018-0052

Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555- 0001

**RE: Docket ID NRC-2018-0052; Holtec International's HI-STORE CIS Facility for Spent Nuclear Fuel, Lea County, New Mexico**

NRC:

I respectfully submit these scoping comments on the Holtec Environmental Report (ER) to bring up to 100,000 metric tons of spent fuel and additional reprocessing waste—high-level radioactive waste—from nuclear reactors around the country to southeastern 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 shipments of highly radioactive waste through thousands of communities nationwide to New Mexico with possibly another 10,000 shipments later to some as yet unknown repository. The transportation phase alone is reckless and the entire project is irresponsible.

Holtec's application is for up to 120 years with a high possibility of waste remaining for at least 300 years. By that time the fragile, thin-walled containers will mostly likely be too delicate to move leaving all the nation's high level waste in a permanent, shallow land fill. The only benefit to New Mexico appears to be about 55 long-term jobs.

A public process at least as robust as that for the Yucca Mountain facility must be undertaken as the transportation routes go through most congressional districts, many major metropolitan areas, large amounts of agricultural land and environmental justice communities. Three New Mexico scoping meetings and one call-in national meeting are totally inadequate.

Geological and hydrological investigations at least as robust and comprehensive as those for WIPP must be undertaken as the site is a complex geological area with earthquakes, many natural resources, and karst formations including massive sinkholes. Those investigations were many and took years. Even if WIPP is sited on an island of non-karst in the middle of one of the largest karst areas in the world, the likelihood that Holtec is also sited in such a so-called safe area is remote; much more needs to be known about the geology and hydrology of the Holtec site before we can be sure it is safe. The studies for Holtec more resemble studies for a local gas station than those for a site planning to store and possibly dispose the most deadly wastes in the entire nuclear fuel cycle.

**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.
- There is no current repository and it could be hundreds of years or never before one is created. Though New Mexico was promised that high level waste would never come to WIPP, WIPP could become that repository and already has modifications underway to increase its size and to allow it to accept high level waste.

**The Impacts Of Permanent Indefinite Storage (De Facto Disposal) 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.

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

SUNSI Review Complete

Template = ADM-013

E-RIDS=ADM-03

ADD= Antoinette Walker-Smith, Jill

Caverly (JSC1)

COMMENT (161)

PUBLICATION DATE: 3/30/2018

CITATION # 83 FR 13802

**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.
- 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.

**Economic Effects On Current New Mexico Industry And Agriculture Must Be Analyzed**

- Impacts of potential contamination on local dairy & pecan farms, tourism, cattle ranching and the oil and gas industries that employ more than 15,000 people must be analyzed.
- Impacts of loss of income and property values from the *perception of contamination* even if it doesn't actually occur must also be analyzed. How many current jobs would be lost if no one wants to buy southeastern New Mexico cattle, dairy and agricultural products or our oil and gas because it's believed it *could* be contaminated?
- This analysis must be extended to current industries and agriculture along the transportation routes to see what effects an accident with and without a release would have on those local economies.

**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.

**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. There doesn't appear to be any way to deal with problem casks during transportation or at the site.
- The application seems to make assumptions that both transportation and containment at the site for centuries to come will be perfect. This is unreasonable and irresponsible.

**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 or how a release from Holtec could affect WIPP.

**Impacts Of Future Railroads And Electric Lines Must Be Analyzed**

- The railroads and electric lines are not in place, but must be analyzed.


**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.

**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 or a much larger earthquake will have on the buried casks. This is an area with a long history of fracking and unstable geology.

Sincerely,

Signed   
Name (Print) Susan Alfred  
City & State Helena, Montana