

NRC-2018-0052

Institute of Nuclear Materials Management  
University of New Mexico Student Chapter

To whom it may concern:

Central to the mission of the Institute of Nuclear Materials Management is dedication to "the safe, secure, and effective stewardship of nuclear materials...to enhance global security<sup>1</sup>." For this reason, and because we believe the proposed consolidated interim storage site will be a benefit to the Carlsbad community and the nation as a whole, we wish to express our support for the proposed site being built and entering full operation.

There are diverse opinions about the future of nuclear energy in the United States, but even if complete abandonment of the nuclear industry were in the near future, consolidation of the nuclear waste already built up would still be the only socially, ecologically, and fiscally responsible way forward. Currently, spent nuclear fuel is building up at dozens of different locations around the country, mostly in coolant pools on power plant sites. Having the waste scattered in this way only multiplies the possibility of an accident that could expose the public and environment to toxic substances. Additionally, the waste is a security concern due to the potential weapons use of radiological and nuclear materials, so significant security manning is required at each waste site (even if the power plant is no longer in operation). By consolidating the waste, billions of dollars can be saved<sup>2</sup>. One might reasonable think that the power plant companies should be able to cover the security costs as they created the waste, but, unfortunately, the federal government passed laws more than 40 years ago making it responsible for the disposal of nuclear waste<sup>3</sup>. In the end, innocent tax payers will be the ones to foot the bill for irresponsible waste management policies.

The major concern of consolidating nuclear waste is transportation to the site. Rightfully, citizens are concerned about the possibility of an accident that could lead to an environmental disaster along the transportation route. Fortunately, we have experienced companies like Holtec that have been transporting waste for years. Their waste canisters are extremely robust containment devices that have been licensed by the Nuclear Regulatory Committee to, among other things, be able to withstand a 30 foot fall, complete envelopment in fire, and flooding in case the cask falls into a body of water<sup>4</sup>. It is no exaggeration to state that in these canisters, the waste will be among the most secure materials being transported on our highways and railways.

Finally, the interim storage site will be an economic benefit to the Carlsbad community. It is clear that this facility will be for the benefit of the community and the nation at large. We believe that work on the site should move forward.

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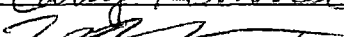
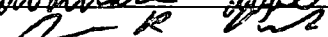
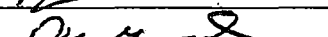

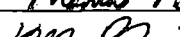

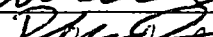



<sup>1</sup> *INMM.org*

<sup>2</sup> *Cost Implications of an Interim Storage Facility in the Waste Management System*. Fuel Cycle Research and Development. September 2016

<sup>3</sup> *Cawley, Kim. The Federal Government's Responsibilities and Liabilities Under the Nuclear Waste Policy Act*. Testimony to Congress. 3 December, 2015

<sup>4</sup> *Safety of Spent Fuel Transportation*. US Nuclear Regulatory Committee . February, 2017.



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