

5/3/18
Carlsbad

NRC-2018-0052

John Waters
1308 W. Riverside Dr.
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May 3, 2018

RE: ENVIRONMENTAL IMPACT STATEMENT FOR HOLTEC INTERNATIONAL'S HI-STORE CONSOLIDATED INTERIM STORAGE FACILITY FOR SPENT NUCLEAR FUEL LOCATED IN LEA COUNTY, NEW MEXICO

Dear Members and Staff of the Nuclear Regulatory Commission:

I want to thank you for coming to our corner of the nation to hear from those that live in Carlsbad and Eddy County. We realize and apologize that you must also endure comments from those people who have come from other regions of the nation and want to dictate to us what we can and cannot do in our own region.

My wife and I were raised in Carlsbad and have, in turn raised our four children here. We chose to come back to Carlsbad to raise our children after WIPP opened. I have seen the tremendous economic benefits that the nuclear industry has brought to Carlsbad, and most recently, Lea County with the opening of URENCO.

Solutions are what I want to talk about. As I am sure all of you are very aware, Carlsbad and Eddy County took on the task of finding a solution for much of the nation's defense nuclear waste. We are fiercely proud that our community worked for a solution to the problem of weapons waste that was piling up in areas around the nation. We took the time to become educated and then fight for the nation's first and only nuclear repository. It is a solution that has helped clean up 22 environmental messes and potential nuclear messes from places like Rocky Flats in Colorado, Lawrence Livermore Laboratory in California, and Argonne National Laboratory in Chicago. We are proud to be the reason that those places, many of which were in highly populated areas, located along coasts, and/or near major geologic faults, are now clean. Had the activists in Santa Fe and other places gotten their way, these places would no doubt be sources of pollution for the environment and a danger to the population. How many of the people from Santa Fe would say the waste was better sitting on the mesa upwind of them rather than in the solution we provided? If they are being honest, I'd say not many.

Now we in southeastern New Mexico offer another solution to a problem that is building up in our most populated areas of the continent along coasts, major rivers, and active fault lines. We are not here to debate the benefits of nuclear power, we are here to look at solutions for the waste. Yes, the solution we offer is a temporary one, but it is a sound one. The same type of activists, even some of the same people, would give the same tired arguments that were presented in the 1980's and 1990's to make the case to stick our collective heads in the sand hoping the problem goes away. As was the case back then, the problem won't go away and it won't get any better where it is. We have a location. It is remote,

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unpopulated, safe, and would be served by a population that is one of the most adept in the world at handling nuclear materials.

As is the case for WIPP, the transportation would be one of the safest in the world. The railcars, like the current WIPP transportation casks that travel on highways through many of the major cities across the United States, are designed and tested to withstand trauma well beyond that which could occur in any rail accident or derailment. If the transportation network is similar to the highly successful system employed by the nuclear weapons complex, every step of the way will be closely monitored and controlled from the minute it is loaded to the minute it is safely stored in the massive concrete storage bunkers at the consolidated storage site. The emergency responders along the way are kept informed and trained in response, should an event occur.

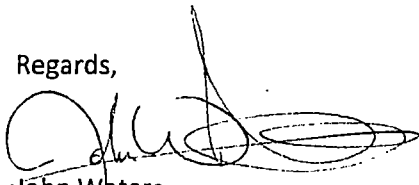
The operation of such a facility would also be an opportune place to study the aging process in the fuel and the containers. It is my hope that the NRC's regulatory research program would take advantage of such a facility as the US Department of Energy has with WIPP, and fund research projects onsite to learn as they provide a temporary solution to fuel storage.

Although this is a temporary solution that envisions 60-80 years, it places our region to be the first in line to provide an ultimate solution in reprocessing, when the technology and economics make this a reality. Given the current trend in technology and the need for additional nuclear fuel around the world, our region would, in the spirit of providing a solution, be the ideal place to move forward with a recycling program. As nuclear fuel is the only reliable source of base load power with little to no carbon emissions, the ability to reprocess the used fuel rods and recover the 80% of the power still left within, while concurrently reducing the waste volume and radioactivity is a goal worth pursuing. While this is not part of the permitting process that you are looking at today, know that if, in the commission's wisdom, the Holtec facility is approved, there would be both temporary benefits and risk aversion to the nation by consolidating the waste storage here, as well as an opportunity to study and learn about the fuel and its handling. In the long run, there would also be the potential for a major positive effect on the environment through reprocessing, when the technology and economics allow it.

As a citizen of Carlsbad I am interested in solutions and thus, fully support Holtec International's license application to construct and operate a consolidated interim storage facility for spent nuclear fuel at the ELEA site between Carlsbad and Hobbs, New Mexico.

Thank you again for taking the time to consider my comments.

Regards,



John Waters

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