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**Docket:** NRC-2018-0052

Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Comment On:** NRC-2018-0052-0058

Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Document:** NRC-2018-0052-DRAFT-0157

Comment on FR Doc # 2018-10418

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## Submitter Information

**Name:** Bruce Dale

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## General Comment

See attached file(s)

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## Attachments

BDale Holtec comment

SUNSI Review Complete  
Template = ADM-013  
E-RIDS=ADM-03  
ADD= Antoinette Walker-  
Smith, Jill Caverly (JSC1)

COMMENT (187)  
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I am a 42-year resident of New Mexico. I urge NRC to support Holtec International's application to build and operate a Consolidated Interim Storage (CIS) facility in Lea County, New Mexico. The project will be good for the local economy and is environmentally benign.

I am satisfied that no unaddressed or unsolved safety issues exist, either for the transportation or storage of the material. The canisters and transportation systems have been extensively tested at U.S. Department of Energy laboratories, covering any conceivable accident scenario.

Much of the opposition to this application stems from ignorance of the science and technology of nuclear materials and supporting systems. Indeed, there is much emotion displayed in the hundreds of comments in the record. However, it is important that NRC base its decision on the technological merits of the application for meeting regulatory requirements.

As we know, Congress directed the U.S. Department of Energy back in the 1980s to develop a permanent repository for spent fuel from the nation's nuclear power reactors. Political opposition has delayed implementation of a permanent repository ever since. Although Holtec's application is for interim storage, consolidating material at a single secure site is surely safer and more economical than the current situation of dozens of dispersed storage locations.

In my opinion, it is not really accurate to view this material as "waste" or even as "spent" fuel, because only a fraction of its recoverable energy has been extracted. A new generation of walk-away-safe reactors, currently under development, includes designs that can consume this material, reducing both the volume and radioactive lifetimes of fission products. Thus, it may be more accurate to regard this material as a future energy source that holds the potential to power the United States carbon-free for centuries. The Holtec repository is an appropriate holding location pending the transition to the next generation of nuclear power reactors. That transition will be essential for the nation's energy security and clean power generation for the future.

I appreciate the opportunity to comment.

Bruce C. Dale

Albuquerque, New Mexico