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June 25, 2018

May Ma, Office of Administration
Mail Stop: TWFN-7-A60M
US Nuclear Regulatory Commission
Washington, DC 20555-001

Re: Docket ID NRC-2018-0052 Holtec International's HI-STORE Consolidated Interim Storage Facility Project for Spent Nuclear Fuel in Lea County, New Mexico

Dear NRC Representative:

I do not consent to Holtec International's proposal to bring high level nuclear waste to SE NM for interim storage. This proposal could directly threaten my livelihood and quality of life.

Deep Roots: My family has been in Roswell for over 110 years, since my Great Grandparent arrived in 1906. This is roughly the time that Holtec is proposing to store spent nuclear fuel. Having studied my family's past, I am very aware of the vast changes that have occurred in the last 100 years. With this long history comes a long future perspective, in which one can only envision the same vast changes in store during the next 110 years. It took my family all these generations to build the lives and businesses we have today in agriculture and oil & gas. To import the nation's accumulation of commercial spent fuel rods is not the legacy that I would like to leave my family's future generations.

Economic Development: Holtec is promoting this project as good economic development for the state. A handful of residents in Carlsbad also see the personal financial gains that this project would provide. But any professional knows that waste, whether solid, hazardous or nuclear is a poor economic development vehicle. Waste offers short term gains and long term liability. With spent fuel rods, the liability is very, very long term. Once the government subsidy is gone, so is the incentive and thus the

company, but the waste remains. Our US Government has also made commitments regarding this project but through time, changes in administrations beget changes in priorities, laws & personnel. This lack of government memory and thus dependability is currently on display. The DOE promised the citizens of New Mexico that WIPP's mission would never be expanded but that is happening now. Listening to NRC discuss a project scheduled to last 120 years rings of the same empty promises.

Critical Economic Industries, Oil & Gas: In 2016, New Mexico produced 145 million barrels of oil and 1.27 trillion cubic feet of natural gas. In recent years, the state derived more than 25% of its general revenues from the oil & gas industry. These taxes and royalties have contributed more than 90% of the principal in the Severance Tax and Land Grant Permanent Fund, earnings that fund education and other state functions. More than 11,000 jobs are directly generated by this industry. This industry is critical to the economic health of New Mexico's economy. It is counter intuitive to put this industry at any level of risk.

Site Suitability: Holtec's proposed site is located right in the middle of the Permian Basin, one of New Mexico's richest oil & gas reserves. Appendix A illustrates this (<http://nm-emnrd.maps.arcgis.com/apps/webappviewer/index>). The first well was drilled in 1927, and since that time drilling has been ongoing. With new fracking and horizontal drilling technologies, drilling has intensified. These activities have changed the underlying geology in ways that no one can predict. Tremors, sink holes, newly heaving and shrinking topography, fracturing of underlying strata are just some of the symptoms. The stability of this site is certainly in question. The status of the site today could and probably will be irrevocably changed throughout the next 120 years.

Long Term Site Integrity: As a solid waste professional for many years, I watched as landfills were being designed and built based on the leading edge of current engineering technology. However, accepted knowledge industry-wide was that no matter how rigorous the design, all landfills will eventually leak. At least this industry is honest. To assume that testing in a controlled or real situation for 30 to 35 years is equivalent to 120 years, is human arrogance. One only has to look to our crumbling infrastructure.

The integrity of this 'interim' storage system over the 120 years needs to be proven prior to aggregating the entire nation's stockpile of this waste. Prudence (caution and circumspection as to danger or risk) dictates that this system be employed using smaller amounts to mitigate the degree of contamination should failure occur. Remember, failure will no doubt occur many years in the future. The Grandparents of those that must deal with it haven't even been born yet.

Fairness: New Mexico has utilized only a tiny fraction of the nuclear energy that has been generated since the 1950s. Remembering that New Mexico is already permanently storing the nation's transuranic waste from weapons development at WIPP, it is unfair to burden New Mexicans with the nation's entire stockpile of commercial high level nuclear waste as well. Rather, each state should be responsible for the waste generated in and enjoyed by the citizens of that state. If in fact the Holtec Hi-Store storage system is as impermeable as proponents profess, then sites can be located in every state needed. This would eliminate the cost of transporting this material thousands of miles, and eliminating the risk to citizens all along the way. However, if there exists questions as to the long term stability of the system, it is criminal to allow such a massive amount of material in one location.

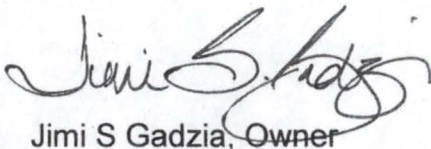
Health Standards: From appointments by two Governors, I served on the State of New Mexico's Environmental Improvement Board for 10 years. This Board's mission was to promulgate regulations for the New Mexico Environment Department. While I was Chair, the Board was tasked with establishing health standards for exposure to naturally occurring radioactivity. Workers were encountering this in the oil patch as a result of deep drilling activities. For those hearings, we invited numerous experts in the health industry, nuclear industry, and others to assist us. What I learned from that experience is that no one really knows what the standards should be, how much is too much, how much is tolerable over a person's lifetime. The standards that were established were just a compromise between interests, and not the safety assurance that the public relies on.

SUMMARY: The biggest supporters of this project other than the NRC seem to be those who have a financial stake in it or in the industry. As demonstrated at the public meetings held around the state, **the predominant opinion was non-consent.** New Mexico is already serving the nation in permanently disposing of a portion of the Government generated nuclear waste and has a long way to go to clean up the contamination that has resulted from industry related mining and weapons development and testing. As a result, New Mexicans have been subjected to increased long-term exposure from radioactivity. Additionally, this project has the potential to threaten two critical industries to New Mexico, agriculture and oil & gas. Intensive fracking and horizontal drilling activity in the Permian Basin and the resulting impacts to the geology, make this site unsuitable for long term storage.

New Mexico is responsible for only a tiny fraction of this waste generated and should not be burdened with the nation's stockpile. Rather, this waste should remain in the state where it was generated. This is not only just and fair, it saves the immense cost and risk of transporting it thousands of miles through population centers. Prudence also dictates that smaller caches of this material mitigate the potential for large scale disasters. The Holtec system has not been adequately tested for the proposed time frame, and any future failure of the system should fall to the state that enjoyed the energy and economic impact for the last 70 years.

It is simply human arrogance to believe that one can predict environmental or political situations 50 much less 120 years in the future. If you could, you wouldn't be working for the NRC at your salary. **I do not consent** to accepting this facility in Southeast New Mexico. I ask that you deny this proposal.

Sincerely,

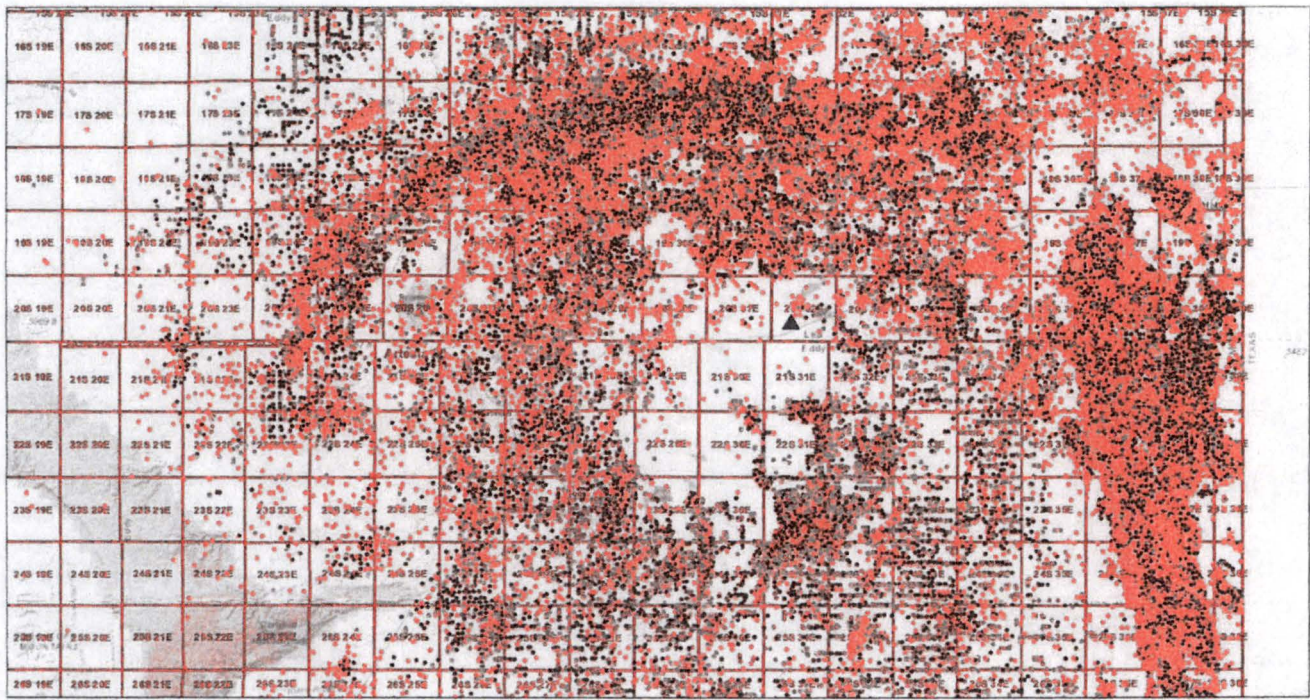


Jimi S Gadzia, Owner

Graham Family Investments, LLC

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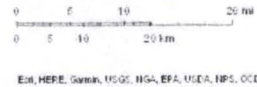
APPENDIX A: Holtec Site



6/26/2015, 10:09:40 AM

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| <ul style="list-style-type: none"> ○ Overhead ● Well Location - Small Scale ● Well Location - Large Scale ● Active ● New ● Plugged ● Cancelled | <ul style="list-style-type: none"> ● Temporarily Abandoned ● CO2, Temporarily Abandoned ● CO2 Active ● CO2 Cancelled ● CO2 New ● Gas, Temporarily Abandoned ● Gas Active ● Gas, Cancelled, Never Drilled ● Gas, New ● Gas, Plugged | <ul style="list-style-type: none"> ● CO2, Plugged ● CO2, Temporarily Abandoned ● CO2 Active ● Gas, Cancelled, Never Drilled ● Gas, New ● Gas, Plugged ● Injection, Active ● Injection, Cancelled ● Injection, New ● Injection, Plugged ● Injection, Temporarily Abandoned ● Oil Active ● Oil Cancelled ● Oil, New ● Oil, Plugged ● Oil, Temporarily Abandoned ● Salt Water Injection, Active ● Salt Water Injection, Cancelled ● Salt Water Injection, New ● Salt Water Injection, Plugged ● Salt Water Injection, Temporarily Abandoned ● Water, Active ● Water, Cancelled |
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ESRI, HERE, Garmin, USGS, NSA, EPA, USGS, NPS, OGC, BLM

New Mexico Oil Conservation Division
 BLM, OGC, Oil and Gas Map. http://www.blm.gov/foia/2013/03/2013-03-01.html#q=oil%20and%20gas%20map%20new%20mexico