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Holtec International HI-STORE Consolidated Interim Storage Facility Project

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Holtec International HI-STORE Consolidated Interim Storage Facility Project

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General Comment

Regarding Docket ID NRC20180052

We Do Not Consent!

See the uploaded file.

Attachments

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Regarding Docket ID NRC-2018-0052

We Do Not Consent!

THE RUSH JOB TO DE FACTO PERMANENT SURFACE STORAGE “PARKING LOT DUMPS,” FOR ALL THE WRONG REASONS: We do not consent to Holtec International/Eddy-Lea Energy Alliance, the rest of the nuclear power industry, the U.S. Nuclear Regulatory Commission (NRC), and the U.S. Dept. of Energy (DOE), rushing into *de facto* permanent surface storage “parking lot dumps” (so-called “centralized” or “consolidated interim storage facilities,” CISFs, a.k.a. Monitored Retrievable Storage sites, or MRS), in order to expedite the transfer of title, liability, and interim storage costs, from the nuclear utilities that profited from the generation of highly radioactive wastes, onto the backs of taxpayers and/or ratepayers.

FLOATING FUKUSHIMAS ON SURFACE WATERS: We do not consent to radioactive waste barge shipments on the lakes and rivers of this country, the fresh drinking water supply for countless millions, nor on the seacoasts. In addition to a disastrous radioactive release if the shipping container is breached, infiltrating water could spark a nuclear chain reaction, if a critical mass forms, due to the fissile U-235 and Pu-239 still present in the waste. (Rail-sized cask shipments bound for Holtec/ELEA, NM, weighing more than 100 metric tons, cannot travel by Legal Weight Truck (LWT) down interstate highways; high-risk barge shipment, for cask transfer onto a train, from some two dozen U.S. atomic reactors lacking direct rail access, to the nearest railhead, is an option that has long been considered.)

MOBILE CHERNOBYLS/DIRTY BOMBS ON WHEELS: We do not consent to highly radioactive waste truck and train shipments through the heart of major population centers; through the agricultural heartland; on, over, or alongside the drinking water supplies of our nation. Whether due to high-speed crashes, heavy crushing loads, high-temperature/long duration fires, falls from a great height, underwater submersions, collapsing transport infrastructure, or intentional attack with powerful or sophisticated explosives, such as anti-tank missiles or shaped charges, highly radioactive waste shipments, if breached, could unleash catastrophic amounts of hazardous radioactivity into the environment. (Heavy haul truck shipments – monster puller truck up front, and perhaps even pusher truck in back, with hundreds of wheels on the trailer in between, would be an alternative to barge shipments; Holtec has indicated it can accommodate any and all cask models at its CISF, meaning that smaller cask LWT shipments, down interstate highways, could still be in play, as well.)

ENVIRONMENTAL INJUSTICE/RADIOACTIVE RACISM: We do not consent to the targeting, yet again, of low-income, and/or people of color communities, with highly radioactive waste *de facto* permanent surface storage “parking lot dumps.” It is most ironic that President Obama’s Blue Ribbon Commission on America’s Nuclear Future (BRC, whose recommendation for CISFs as a top priority, Holtec/ELEA cites), and his DOE, yet again explicitly targeted Native Americans. Obama honored Sauk and Fox environmental activist Grace Thorpe for defending her reservation in Oklahoma against a “parking lot dump,” and then assisting allies at dozens of other reservations being targeted by DOE’s Nuclear Waste Negotiator. Obama praised Thorpe as a “Woman Taking the Lead to Save Our Planet,” alongside the likes of Rachel Carson of *Silent Spring* fame, in his March 2009 Women’s History Month proclamation. (Similarly, Yucca Mountain, Nevada is Western Shoshone Indian land, as the U.S. government acknowledged by signing a treaty. In addition, Yucca is not scientifically

suitable. It is an active earthquake zone, a volcanic zone, and water-saturated underground. If waste is ever buried there, it will leak massively into the environment. And the State of Nevada has never consented to becoming the country's high-level radioactive waste dump.) This round of CISF schemes has targeted the s.e. NM/w. TX borderlands, communities with very large Hispanic populations, already heavily polluted by widespread fossil fuel and even nuclear industries. Holtec's CISF would contribute significantly to these "nuclear sacrifice zone" radioactive risk impacts to health, safety, and the environment. Environmental justice (EJ) demands the Holtec/ELEA CISF be stopped.

SITES CURRENTLY AT THE VERY TOP OF THE TARGET LIST FOR DE FACTO PERMANENT SURFACE STORAGE "PARKING LOT DUMPS":

We do not consent to the targeting of nuclear power plants, radioactive waste dumps, or DOE sites, already heavily contaminated with radioactivity and burdened with highly radioactive waste, to become "parking lot dumps" for the importation of other sites' or reactors' wastes. DOE, NRC, and industry's current top target is Holtec/ELEA, NM, located just 38 miles from Waste Control Specialists in Andrews County, TX, right on the stateline at Eunice, NM, currently the second top target for a CISF. WCS, already a national "low-level" radioactive waste dump, is immediately adjacent to the uranium enrichment facility in Eunice; DOE's Waste Isolation Pilot Plant is very near the Holtec/ELEA CISF site. Such disproportionately large "nuclear sacrifice zone" impacts in this concentrated area represent bad enough EJ violations; the Holtec/ELEA and WCS CISFs would compound these environmental justice (EJ) violations significantly.

RISKS OF HIGHLY RADIOACTIVE WASTE STORAGE POOLS, AND NEED FOR HARDENED ON-SITE STORAGE (HOSS):

As confirmed multiple times by the U.S. National Academies of Science, and researchers such as Princeton U.'s Von Hippel and Schoepfner, irradiated nuclear fuel storage pools at reactors across the country, are at risk of fires that could unleash catastrophic amounts of hazardous Cesium-137 into the environment over a wide region. Since 2002, a coalition of hundreds of environmental and public interest groups, representing all 50 states, has called for expedited transfer of highly radioactive waste, from vulnerable pools, into hardened dry casks, designed and built to last not decades but centuries, without leaking, safeguarded against accidents and natural disasters, and secured against attack. This hardened on-site storage (HOSS) should be done as close to the point of origin as possible. The rush job to construct and open CISFs such as Holtec/ELEA's, while such pool risks persist, shows that the nuclear power industry and agencies like NRC and DOE have their priorities upside down.

NUCLEAR POWER AND HIGHLY RADIOACTIVE WASTE GENERATION: The mountain of radioactive waste in the U.S. has grown 75 years high, and we still don't know what to do with the first cupful. Radioactive waste may well prove to be a "trans-solutional" problem, one created by humans, but beyond our ability to solve. The only safe, sound solution for radioactive waste is to not make it in the first place. Reactors should be permanently shut down, to stop the generation of highly radioactive waste for which we have no good solution.

ADDITIONAL COMMENT ON THE CRIMINAL INSANITY OF BUILDING NUCLEAR REACTORS IN THE FIRST PLACE:

We have been generating nuclear waste for 70 years now. All this time there has been no method of safely storing this incredibly toxic waste. There still isn't. And there probably never will be. The USA now generates 2000 tons (4 million pounds) of toxic nuclear waste every year according to the nuclear power industry. And we have had serious to major accidents at Three Mile Island, Fukushima, and Chernobyl. Chernobyl especially took many lives, will be causing genetic defects to the surrounding population for years and years. The jury is still out on Fukushima.

Here are some of the EPA's statistics on the half-lives of "commonly encountered radionuclides" generated by nuclear reactors.

The half-life of iodine-131 is 8 days.

The half-life of cobalt-60 is 5.27 years.

The half-life of tritium is 12.3 years

The half-life of strontium-90 is 29.1 years.

The half-life of cesium-137 is 30 years.

The half-life of technetium-99 is 212,000 years.

The half-life of iodine-129 is 15.7 million years.

Generally, artificial isotopes of thorium come from decay of other man-made radionuclides, or absorption in nuclear reactions.

The half-life of thorium-228 is 1.9 years.

The half-life of thorium-230 is 75,400 years.

Thorium-232 has a half-life of 14 billion years.

Plutonium has at least 15 different isotopes, all of which are radioactive. The most common ones are Plutonium-238, Plutonium-239, and Plutonium-240.

Plutonium-238 has a half-life of 87.7 years.

Plutonium-239 has a half-life of 24,100 years.

Plutonium-240 has a half-life 6,560 years.

The range of these half-lives goes from days, to 10's of years, to thousands of years, to millions of years, to billions of years. The persons promoting the nuclear power industry, then, are saying to our descendants: "For the next billion years or so, you take care of the dangerous, very highly toxic, cancer-causing wastes that we have produced in vast quantities. That is our legacy to you." This, simply put, is criminal insanity. And this is what needs to be shouted out every day that a single nuclear power plant is still in operation.

Any sane cost-benefit study of the benefits of building and operating nuclear power plants versus the risks to us and succeeding generations from meltdowns, radioactive waste fuel fires, harm from radioactive wastes in the atmosphere and on the ground and in the soil and in underground water supplies and in the oceans, the resulting cancer deaths, and so on, could only legitimately come to one conclusion: the building and operation of nuclear power plants is criminally insane and the persons who foster this are guilty of criminally negligent homicide.