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General Comment

I don't want any "interim storage." What if so-called interim surface storage (for only 40 years, which is already a long time, in most peoples books!) becomes much longer term, or even de facto permanent?

A major problem with de facto permanent surface storage is, the containers could eventually breach (as via age-related degradation, due to exposure to the elements), and disgorge their contents into the environment. This would represent a catastrophic release of large amounts of hazardous radioactivity into the environment, which could then blow downwind, and flow downstream, to harm people and other living things. In its Feb. 2002 Final Environmental Impact Statement for the proposed Yucca Mountain, Nevada national repository for highly radioactive wastes, the U.S. Department of Energy (DOE) warned that irradiated nuclear fuel dry cask storage, if abandoned at reactor sites over long time periods, would eventually fail and cause catastrophic radioactivity releases into those local environments. But the same could happen in s.e. NM at Holtec/ELEA, and in w. TX at WCS. No matter where such catastrophic radioactivity releases would occur at reactor sites across the U.S., or along the TX/NM borderlands they would be equally unacceptable, and must be prevented at all costs!

The two proposed CISFs/MRSs are located just 38 miles apart. In a real sense, this is a single proposal. In fact, Holtec CEO Kris Singh said at a press conference on Capitol Hill in April 2017 that he does not see Holtec/ELEA and WCS are competitors, but rather as complementary. This is a blatant attempt to turn the Texas/New Mexico borderlands into a highly radioactive waste sacrifice zone for the rest of the country!

In 2008, under court order, the U.S. Environmental Protection Agency acknowledged that commercial irradiated nuclear fuel remains hazardous for a million years into the future. This is actually an underestimate. Take Iodine-129, as but one example. Its half-life is 15.7 million years. It will remain hazardous for at least

ten half-lives, or 157 million years. I-129 is an artificial radioactive isotope, contained in highly radioactive irradiated nuclear fuel waste, too.

A 2013 U.S. Senate bill forerunner to current versions of the legislation in Congress added to the risks of "interim" storage sites becoming de facto permanent parking lot dumps, by stating a preference for co-location of pilot interim storage alongside large-scale, non-priority interim storage, and even the permanent repository (that is, permanent burial dump).

In the past, there have been previous attempts to turn s.e. NM into a highly radioactive waste permanent geologic disposal site, such as at or near the WIPP (Waste Isolation Pilot Plant) site.

Also, the waiver of any connection or "linkage" between development of centralized interim storage facilities (CISFs, a.k.a. Monitored Retrievable Storage sites) and progress toward opening a repository only increases the risk that stored wastes will simply be allowed to remain in centralized, so-called interim, surface storage facilities indefinitely into the future. In other words, they could become de facto permanent parking lot dumps.

U.S. Senator Jeff Bingaman (D-NM), Chairman of the Energy and Natural Resources Committee, warned against this de-linkage in 2012. In fact, the requirement for a permanent disposal repository being opened and operating was, and still is, essential and foundational in the Nuclear Waste Policy Act, as Amended, the benchmark law on commercial irradiated nuclear fuel and highly radioactive waste management. This was, and still is, a safeguard against interim storage sites becoming de facto permanent surface disposal, or parking lot dumps.

Note that linkage requires an operating repository, not just a licensed one, nor just a proposed one by someone, for someday, somewhere, some way. Remarkably, current DOE (U.S. Department of Energy) projections for the opening of a permanent burial dump are by 2048, 30 years from now, although they don't know who, where, or how!

2048 is 106 years after Enrico Fermi generated the first cupful of high-level radioactive waste of the Atomic Age, in his Chicago Pile-1 at the University of Chicago squash court under the football stadium, on Dec. 2, 1942 as part of the Manhattan Project race for the atomic bomb; 2048 is 99 years after the first so-called civilian, or commercial, irradiated nuclear fuel was generated, at the Shippingport atomic reactor near Pittsburgh, PA. Such remarkable delays in high-level radioactive waste management and disposal are another red flag, warning about WCSs and/or Holtec/ELEAs CIS facilities becoming long-term, or even de facto permanent, surface storage parking lot dumps.

Please rethink your waste management.

Thank you for your attention to my opinion.

Sincerely,

Karl Koessel