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General Comment

Southeast New Mexico, near the Texas border, has the dubious distinction that every single train car load of high-level radioactive waste will pass through on its way into (and, if it ever leaves, out of) Holtec International/Eddy-Lea [Counties] Energy Alliance (ELEA). But transport impacts, to eventually import more irradiated nuclear fuel than currently exists in the U.S. into s.e. NM, will be felt nation-wide. Transporting 100,000 metric tons, or more, of irradiated nuclear fuel to NM makes this proposal even bigger than the highly controversial, unacceptable Yucca Mountain, Nevada permanent burial dump scheme, in terms of transport impacts (limited to 70,000 metric tons under current law). In that sense, when it comes to radioactive waste transportation risks, we all live in New Mexico.

For this reason, only four NRC public comment meetings (three in s.e. NM, and one at the agency's HQ near Washington, D.C.), are woefully inadequate. Countless millions of Americans, in most states in the Lower 48, would be put at risk by these highly radioactive, irradiated nuclear fuel shipments by train, truck, and/or barge. (See, for example, the national transport impacts associated with the proposed Yucca Mountain, Nevada permanent burial dump for highly radioactive waste:

Nevada Agency for Nuclear Projects - Cities Potentially Affected by Shipments to Yucca Mountain
(pdf-2.45M)

< http://www.state.nv.us/nucwaste/news2017/pdf/Cities_Affected.pdf >

Nevada Agency for Nuclear Projects - States Potentially Affected by Shipments to Yucca Mountain, Nevada - Fred Dilger, PhD

<<http://www.state.nv.us/nucwaste/news2017/State%20Maps.pdf>>

Nevada Agency for Nuclear Projects - Congressional Districts Potentially Affected by Shipments to Yucca Mountain, Nevada

<<http://www.state.nv.us/nucwaste/news2017/115th%20Congressional%20Districts%207252017.pdf>>

The further from the targeted destinations (Yucca Mountain, NV and s.e. NM), the more identical the routes would be for shipments. The closer to the targeted dump-sites the shipments came, the more the NV and NM routes would diverge. But as you can see, shipments to NM, just like shipments to NV, would impact most states.

For this reason, NRC should be holding environmental scoping public comment meetings across the country, not just in s.e. NM (and a single national meeting at the agency's HQ in Rockville, MD). Americans nationwide should demand NRC hold a hearing in their impacted community! The U.S. Department of Energy (DOE), during its Yucca Draft Environmental Impact Statement (DEIS) public comment period many years ago, initially planned a dozen meetings nationwide. Under public pressure, DOE was forced to double the number of such meetings, in communities impacted elsewhere across the U.S., as well.

But a de facto permanent surface storage parking lot dump at Holtec/ELEA in s.e. NM would only increase safety risks. It would not decrease them. It would multiply transport risks, as it would only be temporary (supposedly, even if decades, or centuries, or more, can be called temporary!). All that highly radioactive waste would have to move again, to a permanent burial site (yet to be identified that's a big IF! Yucca is NOT suitable!). And that could be back in the same direction from which it came in the first place, meaning transport corridor communities could see these high risks coming and going!

Holtec/ELEA's assumption that the dump at Yucca Mountain, Nevada will open someday, to take the highly radioactive waste away, is inappropriate. The vast majority of Nevadans have expressed their very adamant non-consent for 30+ years now, and still vehemently oppose it. This is reflected by bipartisan resistance by elected officials, at both the state government level, as well as the congressional delegation level, in NV.

Holtec/ELEA's assumption that another permanent burial dump will be opened, by someone, somewhere, someday, somehow, is also inappropriate. After all, the search for a national geologic repository has gone on since the 1950s, but has failed. And DOE's current estimate for the opening of the U.S.'s first repository is 2048, 31 years from now. Except they have no idea where that will be. There is every likelihood that the 2048 date will slip into the future as well.

The failed Private Fuel Storage, LLC (PFS) parking lot dump targeted at the Skull Valley Goshutes Indian Reservation in Utah, likewise assumed the Yucca dump would open. They were, of course, incorrect. PFS was based on Holtec casks, just as is the current NM scheme.

This game of high-risk, highly radioactive waste musical chairs, or highly radioactive waste hot potato, on the roads (initial leg heavy haul truck shipments), rails, and waterways (initial leg barge shipments), is unacceptable. It amounts to Radioactive Russian roulette on the roads, rails, and waterways.