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General Comment

I write as Chair of the Alamo Group (San Antonio), Lone Star Chapter (Texas), Sierra Club. I represent the almost 2800 members of our group in urging you to reject the Holtec International HI-STORE Consolidated Interim Storage (CIS) Facility Project. This proposal, like the proposal from nearby Waste Control Specialists (WCS), will not solve our nations problem of what to do with nuclear waste.

I lived in Midland, TX for many years during the entire evolution of WCS from a standard hazardous waste site, through its approval (after 3 legislative tries) as a Low Level Radioactive Waste (LLRW) site. It, like Holtec, now aspires to receive High Level Radioactive Waste (HLRW).

HLRW is largely spent nuclear power plant fuel rods. Interim Storage is fundamentally flawed. Current storage of these is at each reactor site. This has been proven by decades of history as the safest storage option. Power plant sites already require advanced security measures, 24 hour monitoring, and the spent fuel rods are encompassed in the high risk profiles already created by the power plant reactors themselves. The claim that plant sites are running out of storage capacity is unfounded. The real motivation for CIS is to unload this liability from the private power plants to the U.S. Government.

Eastern New Mexico and West Texas are far from large populations centers, but there are real populations living in these areas nonetheless, people who should not bear the brunt of risks from nuclear wastes produced far away. The fact that these are largely poor minority communities makes this an important environmental and social justice issue. I know from my experience in Midland and my many trips to Andrews, TX, and Eunice, Carlsbad and Hobbs, NM, that the largely white, affluent city leaders who promote jobs DO NOT speak for the real concerns of these minority populations, who have a long history of being ignored, manipulated,

overruled and cajoled into silence.

Transport of thousands of shipments of HLRW over our roadways and railways for decades cannot be safer than the current situation of storage on site. These shipments will pass through and near most of the large population centers in the U.S., including San Antonio, to which WE DO NOT CONSENT. Emergency response capabilities are stretched to the limit in many of our cities. Rural responders are often volunteers with limited training and equipment but may be called to deal with a major nuclear disaster from just one leaking, or even stolen or attacked transport cask. Government predictions show at least one such serious accident occurring among 10,000 canisters. One such accident could release Fukushima equivalents of radiation, anywhere along these many shipment routes. The risk and expense of such transport should be taken ONLY ONCE, when a PERMANENT storage site is chosen and developed. Interim storage has a very high likelihood of becoming de facto permanent storage. Out of sight, out of mind will take hold, and Congressional interest in providing adequate funding to find and develop a truly safe Permanent repository (to the extent anything requiring thousands of years of safety profile can be called such) will disappear.

Holtecs proposals for shallow canister storage of thin walled double layer casks is not at all acceptable. Computer simulation testing is not enough. Thorough real life canister testing is required. The proposal has no continuous monitoring for leaks, and no terrorist mitigation planning. The proposed interim time frame will not even cover full cooling.

Transport cask crack, leak or disappearance are serious risks. One out of 10000 canisters could easily end up unaccounted for in the course of decades. The history of Los Alamos Labs is replete with improperly disposed of materials, and lost materials, including plutonium. Holtec (and WCS) should not be allowed to claim proprietary rights to hide information in the environmental report, information vital for assessment of the proposal and public understanding of its risks.

All possible transportation methods and routes for this proposal need to be analyzed and impacts on all communities on routes included. Not only transportation accidents must be considered. Terrorism of all kinds must be carefully examined. Canister loss, theft diversion or disappearance must be assessed. The Holtec site itself does not describe how leaks would be handled.

The Alamo Sierra Club does NOT consent to HLRW shipments through Bexar County. We urge you to reject the inadequate Holtec proposal. Interim storage is a misnomer and a sham to the American public. It is NOT safe and we urge you instead to get back to the serious business of finding an acceptable PERMANENT disposal site as soon as possible.

Terry Burns, M.D.

Chair, Alamo Sierra Club

Lone Star Chapter, Sierra Club