

Holtec-CISFEISCEM Resource

From: Kristina Fisher <kristinagrayfisher@gmail.com>
Sent: Friday, July 13, 2018 11:52 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Docket ID NRC-2018-0052; Holtec International's HI-STORE CIS Facility for Spent Nuclear Fuel, Lea County, New Mexico

As a lifelong New Mexican, I am writing to express my profound opposition to the Holtec Environmental Report (ER) proposal to transport up to 100,000 metric tons of spent fuel, high-level radioactive waste from nuclear reactors across the nation and store it in shallow dirt pits in southeast New Mexico.

When WIPP was constructed in our state, New Mexicans were repeatedly promised that it would not be the first step toward making our state a national sacrifice zone for high-level radioactive waste. Allowing the Holtec proposal to move forward is an act of bad faith that makes all those promises ring hollow.

I do not consent to my beautiful state becoming a nuclear waste dumping ground. I do not consent to the transport of up to 10,000 canisters of highly radioactive waste through thousands of communities nationwide, including those of my family, friends, and neighbors. I do not consent to the risk of permanent contamination of New Mexico's lands, aquifers, air, or our plants, wildlife and livestock. I do not consent to endangering the health and environment of present and future generations, which would result from Holtec's proposal.

The Holtec project would lead to dangerous extensive transport of high-level radioactive waste that would travel through major US cities, over major aquifers and across Tribal and agricultural lands. (Another round of transport of this waste would then theoretically occur again in a few decades when the waste is moved from its "temporary" storage in New Mexico to a permanent site in a yet unknown location.) Without knowing the routes over which this high-level nuclear waste would be transported, the public cannot adequately comment on the impacts of this massive project: communities do not even know that they are in jeopardy.

Here are a few concrete items that I urge you to consider:

1. Holtec's Proposal Is Contrary to Current Law Current law only allows the U.S. Department of Energy to take title to commercial spent fuel "following commencement of operation of a repository" or at a DOE-owned and operated monitored retrievable storage facility. The Holtec site meets neither requirement, as it is a private facility.
2. Holtec Must Remove Copyrights and All Redactions in the Environmental Report. The NRC must require Holtec to produce an ER that has no such copyright restriction and has no redactions. The American people have a right to this information.
3. The Impacts of Permanent Storage Must Be Analyzed The Environmental Report (ER) is inadequate and incomplete because it does not analyze the impacts of the spent fuel being left at the Holtec site indefinitely. This site is proposed for "temporary" storage, yet if not permanent repository is created, or if casks crack and become so damaged they cannot be transported again, what are the risks to our communities?
4. More Alternatives Must Be Analyzed

Keeping the spent fuel casks in some form of Hardened On Site Storage (HOSS) on the reactor sites must be analyzed. The alternative of consolidated storage being done at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) must also be analyzed.

5. The Environmental Report inadequately discusses the Transportation Risks This ER must include all transportation routes and the potential impacts of accidents or terrorism incidents on public health and safety along all the routes. The current ER is inadequate and incomplete because it does not discuss how rail shipments from reactors without rail access would be accomplished and the risks and impacts of such shipments. How vulnerable are the shipments to terrorism or accidental collision, and what are the worst-case scenario consequences for the people living near such an incident?

6. The Consequences for an Accident-Exposed Individual Must Be Analyzed Terms like “collective dose risk” and “person-rem” are used to ignore the potential impacts to a single individual.

7. Cracked and Leaking Casks Must Be Addressed The ER does not analyze exactly how radioactive waste from a cracked and leaking canister would be handled, since there is no wet pool or hot cell at the site. The NRC estimates a low risk of cask failure for the first 20 years, even though cask cracking has been seen after only 10 years. It is extremely likely that if Holtec's proposal goes through, the casks will sit in the desert for decades. Cracked and leaking casks are inevitable, and the risks and containment strategies must be fully addressed.

8. More Cumulative Impacts Must Be Analyzed The ER mentions WIPP but does not analyze the impacts of a radiologic release from WIPP on the proposed CIS site.

9. Impacts of Future Railroads and Electric Lines Must Be Analyzed The railroads and electric lines for the Holtec site are not in place, but must be analyzed in the ER.

10. How many of the estimated 135 jobs will go to New Mexicans?

New Mexicans are being asked to accept the full burden of health risks from this facility, yet it is unclear how much of the economic benefit will accrue to members of the surrounding communities. The total number of annual workers at the site is estimated to total as many as 135 when construction jobs are combined with the operating workforce.

11. Seismic Impacts on Stored Casks Must Be Stated Although the ER gives a statement on recent seismic activity in the area, there is no analysis of what impacts many 3.0 – 4.0 fracking-induced earthquakes will have on the buried casks.

12. The impacts of global warming on climate in the region and the potentially accelerated degradation of casks and canisters, in relation to their ratings, must be considered.

Thank you for considering my comments.

Kristina Fisher

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