

Holtec-CISFEISCEm Resource

From: Susybelle Gosslee <sgosslee@airmail.net>
Sent: Tuesday, July 24, 2018 10:25 AM
To: Holtec-CISFEIS Resource
Cc: Susybelle Gosslee
Subject: [External_Sender] LEAGUE OF WOMEN VOTERS OF TEXAS Comments Docket ID NRC-2018-0052



TESTIMONY

LEAGUE OF WOMEN VOTERS OF TEXAS

Docket ID NRC-2018-0052

MONDAY, APRIL 30, 2018

I am Susybelle Gosslee, testifying as a member and on behalf of the League of Women Voters of Texas regarding the license application for the proposed consolidated interim storage facility called HI-STORE CIS to be built by Holtec International in southeastern New Mexico and in Andrews County, Texas. (Docket ID NRC-2018-0052.)

We appreciate the opportunity to appear before you today. Thank you for allowing me to share the League of Women Voters of Texas position on this issue.

We are concerned about many aspects of this high-level radioactive waste storage proposal, most importantly the health, safety, and transportation risks. Our position on hazardous materials and high-level radioactive materials, like other League positions, is derived through a lengthy and thoughtful process involving the participation of twenty-five city Leagues representing our members and supporters throughout the state of Texas.

I am giving you a copy of the Dallas County Resolution stating that Dallas County does not want high-level radioactive waste transported through it. (This was delivered to the members of the commission at the hearing in New Mexico.) How many other governmental bodies would pass a similar resolution if they knew such dangerous material would be transported through their parishes and counties? Why should they take the risk of endangering their residents and environment?

The League has pushed since 1980 for passage of a national policy that would incorporate adequate environmental and public health safeguards with a strong role for public participation in nuclear-waste repository siting decisions. This hearing is only a part of the public participation process. Public meetings need to be held in every state that will have high-level radioactive waste transported through it.

Neither Holtec International, WCS, nor any other company should be allowed to develop an interim storage location without an approved plan for a permanent disposal site and robust system for storage. Doing otherwise would not protect local residents, their health, or the environment from having this temporary site become a permanent site. What is the plan for locating a permanent repository for this hazardous material?

More specific information is needed by a verifiably independent third party to authenticate the suitability of the proposed New Mexico and Texas sites by using data accumulated with the most up-to-date research, in addition to the past and present data provided by the corporations involved with the sites. A conflict of interest and the appearance of a conflict of interest should be avoided and is of great importance to ensure best practices and trust in the site selection.

Transportation issues are of great concern. The United States was previously number one in the world in its investment in infrastructure, but now it is twenty-eighth compared to other countries of the world. Road and rail conditions are documented to be inadequate to meet the challenge of carrying so much dangerous waste. It appears that 10,000 shipments of high-level radioactive waste could occur over a period of twenty years. No transport of this scope and magnitude has ever occurred before.

Accidents do happen. For example, a 150-car freight train traveling 50 miles per hour will take over a mile to stop! According to the U.S. Department of Transportation, there are about 5,800 train-car crashes each year in the United States, most of which occur at railroad crossings. These accidents caused 600 deaths and injure about 2,300 people, according to *Train Accident Statistics: Atlanta Train Accident Attorney McAleer Law* (additional data available at the Federal Railroad Administration.)

What would be the standards and guarantees for railroad lines' routes for this highly radiated material? What would be the financial assurances provided by the railroad companies, the states, and Holtec International? How would the financial assurances be monitored? Who would inspect and monitor the system? What would be the penalties if the safety and financial assurances are not adequate? What specific standards would be required for the railroad companies to meet before high-level radioactive waste is transported on their rail lines across the country? How would the standards be developed? What would be the ongoing inspection process to ensure safe railroad lines? What would be the actual cost to the counties, states, and the federal government along the transportation routes?

Since Holtec has proposed to "initially store 500 canisters or 8,680 metric tons of uranium in the consolidated interim storage facility (CISF) and eventually will store up to 10,000 canisters in the CISF," how would the railroad lines, the states where the roads are located, and all companies involved in the process guarantee to provide continual maintenance to avoid accidents.

The Holtec website states that it will "cumulatively hold 8,680-metric tons (nominal) of fissile material" which raises the question of what do they mean by "nominal"? Does nominal mean existing in name only, theoretical, so-called, but that they really intend to increase the proposed amount described in this initially submitted permit application? Does Holtec really mean to say that 8,680-metric tons is a very small amount? Or is the amount far below what they intend to store there. Is there statement symbolic? Or does the term mean that they are asking for permission to store this amount and have every intention of increasing the amount of their storage after getting approval for the stated amount in this "temporary" storage facility? The company says in their license application that they will request expansions allowing them up to 100,000 metric tons of waste. The inconsistency creates the need for clarification of their true intentions.

Waste Control Specialists (WCS), the Texas radioactive waste storage facility owner, is a joint venture with French-based ORANO USA. All of the statements proposed by the League apply to both the New Mexico and Texas sites.

What would be required of the railroad companies to ensure inspections and monitoring to prevent accidents, protect public health and the environment, the clean-up of accident sites, and payments to those harmed? What would be the penalties for causing an accident? What would ensure vigorous enforcement mechanisms, including sanctions for states and localities that do not comply with federal standards and substantial fines for noncompliance?

The same questions for railroads apply to roads and highways that would be carrying the heavy high-level radioactive waste. How much transport of high-level radioactive waste would be on highways? Heavy loads do more damage to highways than lighter traffic. With states already strapped to maintain their current roads, what would ensure the upkeep and safety of the highways? Who would cover the costs, and how would repairs be done in a timely manner? The level of traffic is one of the reasons leading to more traffic accidents? “In 2015, there were some 6.3 million fatal, injury, and property damage crashes that occurred in the U.S. alone,” according to *Road Accidents in the U.S. - Statistics & Facts | Statista* (<https://www.statista.com/topics/3708/road-accidents-in-the-us/>)

The risks associated with interim storage of spent nuclear fuel, high-level radioactive waste, and reactor-related greater than Class C Waste demand that the highest standards be set, a strong monitoring system be put in place and constantly maintained throughout the transportation process and at the proposed storage sites in Lea County, New Mexico and at the storage site in Andrews County, Texas.

We can learn from past nuclear accidents. It took two days before Sweden detected that reactor #4 exploded at the Chernobyl nuclear power plant in the Ukraine on April 26, 1986, until Russia was forced to reveal the accident. It became the most terrible nuclear accident that the world had ever known at that point. But it was days before people knew exactly what had happened. Radiation released from the explosion at Chernobyl set off radiation detectors in Sweden at Forsmark, a nuclear power plant located a couple hours north of Stockholm and many miles from the Chernobyl reactor.

The wind carried the radiation across Sweden, Europe and the northern hemisphere. Northern Sweden absorbed 5% of the radioactive cesium-137 released into the air by Chernobyl. Cesium-137, like other forms of radiation increases the risk of getting cancer. Since radiation was absorbed in the lichen the reindeer grazed on, almost 80% of the reindeer meat was too contaminated for sale and was destroyed. Even to this day, a small portion of reindeer can't be sold each year because they are too radioactive. What if there is a radioactive release in the U.S.?

After 25 years, the vast majority of radioactive materials have spent out their half-lives. But Cesium-137 still causes problems for reindeer herders, because its half-life is 30 years, which means that about half of it is still present.

Russia, the companies, and scientists involved with Chernobyl said that there would be no problems. We have heard this said many times. For example, the Titanic won't sink. The Keystone pipeline won't break or leak. The B.P. Deepwater Horizon could never have an accident. The levees in New Orleans built by the United States Corps of Engineers won't break. Fukushima is safe.

We have heard safety claims for many sites and projects. The risk of transporting high-level radioactive waste is extremely high. Having storage at each of the sites where the material was created is safer than accumulating it in one central point where it could more easily be accessed by terrorists who could hold us all hostage. Risks for terrorism would be increased by transporting the waste through major cities, near schools, hospitals, businesses, military bases, and chemical plants.

Thank you for having the public comment meetings in Roswell, Hobbs, and Carlsbad, New Mexico; however, none of these cities has easy access by airlines and are inaccessible to most people. Meetings should be held in Dallas/Fort Worth, Houston, San Antonio, El Paso, Albuquerque, and Santa Fe, in addition to major cities across the U.S. that would be likely high-level radioactive transport routes.

Thank you for considering the League of Women Voters of Texas comments.

For additional information, please contact: Susybelle Gosslee, Hazardous Waste Issue Chair, at sgosslee@airmail.net or 214-732-8610.

The League of Women Voters of Texas (LWV-TX) is a nonpartisan citizens' organization that has fought since 1919 to improve our government and engage all citizens in the decisions that impact their lives. It represents more than 5000 members and supporters throughout Texas.

The League of Women Voters never supports or opposes candidates for office or political parties. The member-driven organization of women and men encourages the informed and active participation of citizens in government and seeks to influence public policy through education and advocacy of positions based on extensive issue study and consensus.

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