

Holtec-CISFEISCEm Resource

From: Lezlie Dalton <ElleDalton@aol.com>
Sent: Wednesday, July 25, 2018 9:56 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] COMMENT TO the NRC on Docket ID NRC-2018-0052: Holtec International's HI-STORE Consolidated Interim Storage Facility Project

Dear Nuclear Regulatory Commission Staff:

I write to ask you, in the strongest possible way, to Reject Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste. My reasons are these : 1ST, because centralized or consolidated interim storage sites are NOT ALLOWED UNDER US FEDERAL LAWS to the extent the Department of Energy and US taxpayers are expected to own and transport the waste. This is an ILLEGAL DUMP !!

And, please understand - you must REJECT, and NOT RELY on the Environmental Report done by Tetra Tech for Holtec. A FRAUDULENT, CROOKED CONTRACTOR should not be doing the environmental analysis. For TWO DECADES, Tetra Tech has been falsifying radiation monitoring data, deliberately spreading radioactive soil and waste to previously clean places on and offsite, using unqualified workers to supervise radioactive scanning and cleanup efforts and suppressing and firing whistleblowers at the Navy's huge Hunters Point nuclear site in San Francisco - which is NOW being converted to high-end housing. God help the future inhabitants! All these facts are according to the US Navy, EPA and California Health Department ! Based on this track record, Tetra Tech CANNOT be trusted to assess environmental impacts of the proposed Holtec dump !

The proposed Holtec site VIOLATES ENVIRONMENTAL and ECONOMIC JUSTICE ! The proposed area has valuable industries including pecan, cattle ranches, dairy, and other local farming interests. This is a farming area ! And this area would be threatened by the proposed site ! Even some of the hazardous and extra-active industries that are a big part of the economy oppose this proposed dump! New Mexico "has suffered enough as a national sacrifice zone at the hands of the nuclear industry, including abandoned uranium mines, the Manhattan Project, Trinity Test, plutonium contamination in the rivers downstream from Los Alamos, uranium enrichment, and hosting the nation's transuranic waste at the Waste Isolation Pilot Plant ! As one of the poorest states, and a majority minority state, New Mexico has experienced environmental racism for decades. People of Color continue to be disproportionately impacted by hazardous and toxic wastes." (Samia Assed, Chair of the New Mexico Poor People's Campaign; see: www.nonuclearwaste.org). It is imperative that NRC assesses the multiple stresses on New Mexicans, and failures to compensate them over the history of the atomic age, and absolutely forbid the building of this proposed site.

CASK DANGERS. None of today's certified waste containers have been designed for real world transport conditions (i.e., temperatures, crash speeds, submersion in deep water). These casks have not been physically tested, despite dump-promoter's misuse of 40 year-old crash-test videos on totally different casks. These storage containers cannot be monitored for potential cracks and leaks, inspected, repaired or replaced ! All this, even though we ALREADY KNOW the waste will be DANGEROUS LONGER than the containers will last. The technology is in the "future" according to NRC staff. Nuclear Regulatory Commission (NRC) must include evaluation of moving 10's of 1000's of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railroad tracks, roads and bridges...impacts from many thousands of shipments on infrastructure, on people, businesses, communities, resources all along the way ! The thought of allowing this to happen is monstrous.

HOTTER HIGH LEVEL WASTE. NRC must include full evaluation of “high burn-up” fuel. It is a significant portion of the waste that would go to Holtec.

EMERGENCY RESPONSE. Assess and report on the reliability and capability of volunteer and distantly-located emergency response personnel upon which the site will rely. Include: availability, training, equipping and notification of emergency responders all along the routes !

HARSH ENVIRONMENT. Also consider, in more than a cursory dismissive way, the decades of high temperatures, salty dry climate, potential flash floods, lightning, burrowing animals, sand, blocked vents, wind, rain, fire on the casks and waste. It must be assumed that increased earthquake risks and other impacts from fracking (which is NOT prohibited) will take place near and under the site !

CONSOLIDATED “INTERIM” STORAGE (CIS) COULD BECOME PERMANENT. NRC cannot fail to analyze the consequences of the waste remaining indefinitely at the site...never moving to another location. Holtec proposes to “consolidate” up to 173,600 metric tons of high-level waste from ALL US nuclear power reactors to New Mexico, near the famous Carlsbad Caverns (how terrible), to “temporarily” store for 40-120 years (it could take 40+ years to move it there!) The waste would allegedly be moved again, but if no permanent site is found or money to move it again never appears, it could stay forever, despite not being designed for permanent isolation.

REPROCESSING + PROLIFERATION DANGER. NRC, analyze the possibility of the waste being reprocessed at the site, since consolidating waste is the first step to dangerous reprocessing to extract plutonium, increasing nuclear weapons proliferation, massive water use and intense, irreversible environmental contamination. Reprocessing was proposed at this same site before and must be addressed in the EIS.

This storage plan is patently not acceptable. It is so risky, so irresponsible, so dangerous, so toxic to so many sectors of society and so inhuman in its lack of concern for the life of humans and the planet that it simply **MUST BE REJECTED !** And I call upon you to do exactly that !

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