

## Holtec-CISFEISCEm Resource

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**From:** Ned Flaherty <Ned\_Flaherty@msn.com>  
**Sent:** Wednesday, July 25, 2018 10:21 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:

Reject Holtec International's application for a CISF (Consolidated "Interim" Storage Facility) for high-level nuclear waste because centralized / consolidated interim storage sites are UNLAWFUL to the extent that the DoE and taxpayers must own and transport the waste.

Reject on Holtec's Environmental Report by Tetra Tech. DoE should never allow any FRAUDULENT, CROOKED CONTRACTOR to write any environmental analysis. The U.S. Navy, EPA, and California Health Department proved that, for 20 years, Tetra Tech:

- (1) falsified radiation monitoring data;
- (2) spread radioactive soil / waste on-site and off-site;
- (3) used unqualified workers in radioactive scan / cleanup efforts; and
- (4) suppressed and fired whistleblowers at the Navy's Hunters Point nuclear site in San Francisco.

Tetra Tech is, therefore, disqualified from assessing any environmental impact.

The Holtec site VIOLATES ENVIROMENTAL and ECONOMIC JUSTICE. The proposed area includes pecan, cattle, dairy, and other farming interests.

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 ([www.nonuclearwaste.org](http://www.nonuclearwaste.org))

NRC is obligated to assess the multiple stresses on New Mexicans and failures to compensate them over the history of the atomic age.

CASK DANGERS. None of today's certified waste containers are designed for real world transport conditions (temperatures, crash speeds, deep-water submersion). None have been physically tested, despite the dump-promoter's misuse of 40 year-old crash-test videos on totally different casks. The storage containers cannot be monitored for potential cracks / leaks, inspected, repaired, or replaced even though we know the waste will be dangerous longer than they will last. The technology is in the "future" according to NRC staff.

NRC (Nuclear Regulatory Commission) should evaluate moving tens of thousands of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorated railways, roads, and bridges . . . impacts from many thousands of shipments on infrastructure, on people, businesses, communities, and resources all along the way

HOTTER HIGH LEVEL WASTE. NRC should include full evaluation of “high burn-up” fuel (a major portion of the waste going to Holtec).

EMERGENCY RESPONSE. Assess and report on the reliability and capability of the site's volunteer and distantly-located emergency responders. Include availability, training, equipping, and notification all along the routes.

HARSH ENVIRONMENT. Thoroughly consider 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. ASSUME increased earthquake risks and fracking risks near and under the site.

CONSOLIDATED “INTERIM” STORAGE (CIS) COULD BECOME PERMANENT. NRC must analyze the consequences of the waste remaining indefinitely at the site. Holtec proposes to “consolidate” up to 173,600 metric tons of high-level waste from all U.S. nuclear power reactors to New Mexico, near the famous Carlsbad Caverns, 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 built or transport funding never appears, it could stay forever, despite not being designed for permanent isolation.

REPROCESSING + PROLIFERATION DANGER. Analyze the possibility of the waste being reprocessed at the site, since consolidating waste is the first step to dangerous reprocessing for plutonium extraction, increasing nuclear weapons proliferation, massive water use, and intense, irreversible environmental contamination. Re-processing was previously proposed here, and must be addressed in the EIS.

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