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General Comment

Southeast New Mexico, near the Texas border, has the dubious distinction that every single train car load of high-level radioactive waste will pass through on its way into (and, if it ever leaves, out of) Holtec International/Eddy-Lea [Counties] Energy Alliance (ELEA). But transport impacts, to eventually import more irradiated nuclear fuel than currently exists in the U.S. into s.e. NM, will be felt nation-wide. Transporting 100,000 metric tons, or more, of irradiated nuclear fuel to NM makes this proposal even bigger than the highly controversial, unacceptable Yucca Mountain, Nevada permanent burial dump scheme, in terms of transport impacts (limited to 70,000 metric tons under current law). In that sense, when it comes to radioactive waste transportation risks, we all live in New Mexico.

For this reason, only four NRC public comment meetings (three in s.e. NM, and one at the agencys HQ near Washington, D.C.), are woefully inadequate. Countless millions of persons would be put at risk by these highly radioactive, irradiated nuclear fuel shipments by train, truck, and/or barge. (See, for example, the national transport impacts associated with the proposed Yucca Mountain, Nevada permanent burial dump for highly radioactive waste:

Nevada Agency for Nuclear Projects - Cities Potentially Affected by Shipments to Yucca Mountain (pdf-2.45M)
< http://www.state.nv.us/nucwaste/news2017/pdf/Cities_Affected.pdf>

Nevada Agency for Nuclear Projects - States Potentially Affected by Shipments to Yucca Mountain, Nevada -

Fred Dilger, PhD
< http://www.state.nv.us/nucwaste/news2017/State%20Maps.pdf>

Nevada Agency for Nuclear Projects - Congressional Districts Potentially Affected by Shipments to Yucca Mountain, Nevada
<http://www.state.nv.us/nucwaste/news2017/115th%20Congressional%20Districts%207252017.pdf >

The further from the targeted destinations (Yucca Mountain, NV and s.e. NM), the more identical the routes would be for shipments. The closer to the targeted dump-sites the shipments came, the more the NV and NM routes would diverge. But as you can see, shipments to NM, just like shipments to NV, would impact most states.

Holtec/ELEAs assumption that the dump at Yucca Mountain, Nevada will open someday, to take the highly radioactive waste away, is inappropriate. The vast majority of Nevadans have expressed their very adamant non-consent for 30+ years now, and still vehemently oppose it.

So PFSs Plan B was to return to sender. Holtec has a similar plan, if casks show up damaged or contaminated, in order to protect its supposedly start clean, stay clean Centralized Interim Storage Facility (CISF), or Monitored Retrievable Storage (MRS) site, in s.e. NM. If 100,000 metric tons of irradiated nuclear fuel the amount targeted to go to Holtec/ELEA in s.e. NM were to be returned to sender some decade or century due to the lack of a permanent dumpsite to send it to, what would that look like in terms of multiplied transport risks?!

Such a scenario could unleash disastrous amounts of hazardous radioactivity into the environment, hence the label of potential Dirty Bombs on Wheels. As San Onofre Safety has put it, each Holtec canister holds an equivalent amount of volatile (able to escape in a fire) radioactive Cesium-137 as was released by the Chernobyl nuclear catastrophe. And as Dr. Marvin Resnikoff of Radioactive Waste Management Associates has put it, a container holding 24 Pressurized Water Reactor (PWR) irradiated nuclear fuel assemblies holds 240 times the long-lasting radioactivity (in terms of radioactive Cesium isotopes alone, let alone the hundreds of additional hazardous radioactive isotopes) released by the Hiroshima atomic bomb. Only Holtec has moved on from containers holding 24 PWR assemblies, to ones capable of holding 37 assemblies! That would thus mean 37 Hiroshima atomic bombs worth of long-lasting radioactivity in each container! Only its worse than that, as Resnikoffs figure applied to low burnup fuel; high burnup fuel, unfortunately commonplace today, is even more radioactive!