

## Holtec-CISFEISCEM Resource

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**From:** EK O'Dear <ekodear@gmail.com>  
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**To:** Holtec-CISFEIS Resource  
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I read this and agree with conclusions

What if so-called interim surface storage (for “only” 40 years, which is already a long time, in most people’s books!) becomes much longer term, or even de facto permanent?

A major problem with de facto permanent surface storage is, the containers could eventually breach (as via age-related degradation, due to exposure to the elements), and disgorge their contents into the environment. This would represent a catastrophic release of large amounts of hazardous radioactivity into the environment, which could then blow downwind, and flow downstream, to harm people and other living things. In its Feb. 2002 Final Environmental Impact Statement for the proposed Yucca Mountain, Nevada national repository for highly radioactive wastes, the U.S. Department of Energy (DOE) warned that irradiated nuclear fuel dry cask storage, if abandoned at reactor sites over long time periods, would eventually fail and cause catastrophic radioactivity releases into those local environments. But the same could happen in s.e. NM at Holtec/ELEA, and in w. TX at WCS. No matter where such catastrophic radioactivity releases would occur – at reactor sites across the U.S., or along the TX/NM borderlands – they would be equally unacceptable, and must be prevented at all costs!

What if future replacements for today’s U.S. Representatives from these adjacent congressional districts in NM and TX (some, but not all, of whom are blinded by radioactive dollar signs, and think these CISFs are a good idea!), decide enough is enough, and the high-level radioactive wastes need to move? Those one or two future U.S. Representatives from the TX/NM borderlands, would then face the daunting challenge of overcoming the inertia, or even active opposition, of the other 433-434 Members of the U.S. House of Representatives, who might be just fine with the highly radioactive, irradiated nuclear fuel wastes staying put at WCS, TX and/or Holtec/ELEA, NM forevermore (it’s not in their congressional district, after all!) – which is how long they remain hazardous by the way. (The U.S. EPA has acknowledged a million years of hazard associated with irradiated nuclear fuel! See just below.)

Similarly, even if the TX and NM U.S. Senate delegations united in their opposition to “interim” storage becoming de facto permanent, they would represent only four U.S. Senators, facing off against 96 others!

WCS is short for Waste Control Specialists, LLC. It is located in Andrews County, Texas, immediately upon the New Mexico border at Eunice. Holtec/ELEA refers to Holtec International and Eddy-Lea [Counties] Energy Alliance, located half-way between Hobbs and Carlsbad in s.e. NM. The two CISFs (Centralized Interim Storage Facilities), or MRSs (Monitored Retrievable Storage sites), could import 100,000+ metric tons of irradiated nuclear fuel and other highly radioactive wastes (Holtec/ELEA), and an additional 40,000 metric tons at WCS, TX. There is currently around 80,000 metric tons of commercial irradiated nuclear fuel in the U.S., so Holtec/ELEA and WCS could accommodate twice that amount (enough capacity to stored additional highly radioactive irradiated nuclear fuel wastes generated by U.S. atomic reactors for decades to come!), if both opened and operated!

The two proposed CISFs/MRSs are located just 38 miles apart. In a real sense, this is a single proposal. In fact, Holtec CEO Kris Singh said at a press conference on Capitol Hill in April 2017 that he does not see Holtec/ELEA and WCS are competitors, but rather as complementary. This is a blatant attempt to turn the

Texas/New Mexico borderlands into a highly radioactive waste sacrifice zone for the rest of the country!

In 2008, under court order, the U.S. Environmental Protection Agency acknowledged that commercial irradiated nuclear fuel remains hazardous for a million years into the future. This is actually an underestimate. Take Iodine-129, as but one example. Its half-life is 15.7 million years. It will remain hazardous for at least ten half-lives, or 157 million years. I-129 is an artificial radioactive isotope, contained in highly radioactive irradiated nuclear fuel waste, too.

A 2013 U.S. Senate bill – forerunner to current versions of the legislation in Congress – added to the risks of "interim" storage sites becoming de facto permanent parking lot dumps, by stating a preference for co-location of pilot interim storage alongside large-scale, non-priority interim storage, and even the permanent repository (that is, permanent burial dump).

In the past, there have been previous attempts to turn s.e. NM into a highly radioactive waste permanent geologic disposal site, such as at or near the WIPP (Waste Isolation Pilot Plant) site.

Also, the waiver of any connection or "linkage" between development of centralized interim storage facilities (CISFs, a.k.a. Monitored Retrievable Storage sites) and progress toward opening a repository only increases the risk that stored wastes will simply be allowed to remain in centralized, so-called "interim," surface storage facilities indefinitely into the future. In other words, they could become de facto permanent "parking lot dumps."

U.S. Senator Jeff Bingaman (D-NM), Chairman of the Energy and Natural Resources Committee, warned against this de-linkage in 2012. In fact, the requirement for a permanent disposal repository being opened and operating was, and still is, essential and foundational in the Nuclear Waste Policy Act, as Amended, the benchmark law on commercial irradiated nuclear fuel and highly radioactive waste management. This was, and still is, a safeguard against interim storage sites becoming de facto permanent surface "disposal," or "parking lot dumps."

Note that linkage requires an operating repository, not just a licensed one, nor just a proposed one by someone, for someday, somewhere, some way. Remarkably, current DOE (U.S. Department of Energy) projections for the opening of a permanent burial dump are by 2048, 30 years from now, although they don't know who, where, or how!

2048 is 106 years after Enrico Fermi generated the first cupful of high-level radioactive waste of the Atomic Age, in his Chicago Pile-1 at the University of Chicago squash court under the football stadium, on Dec. 2, 1942 as part of the Manhattan Project race for the atomic bomb; 2048 is 99 years after the first so-called civilian, or commercial, irradiated nuclear fuel was generated, at the Shippingport atomic reactor near Pittsburgh, PA. Such remarkable delays in high-level radioactive waste management and disposal are another red flag, warning about WCS's and/or Holtec/ELEA's CIS facilities becoming long-term, or even de facto permanent, surface storage parking lot dumps.

Thank you  
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"If you want to go quickly, go alone. If you want to go far, go together."  
–African Proverb

"Vision without action is a daydream."

*Nelson Mandela*

"Listen—or your tongue will keep you deaf."  
-Cherokee Proverbs

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