

1401 Las Lomas Rd NE
Albuquerque, NM 87106
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ADD= Antoinette Walker-Smith, Jill
Caverly (JSC1)

May Ma
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U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

COMMENT (271)
PUBLICATION DATE: 3/30/2018
CITATION # 83 FR 13802

Re: Docket ID NRC-2018-0052; Holtec International's HI-STORE Spent Fuel Facility

Nuclear Regulatory Commission:

It is essential that scoping credibly evaluate and give great weight to health and environmental risks. The Tularosa Basin Downwinders show why this is so important. When the bomb was tested at the Trinity Site in New Mexico seventy three years ago decision makers did not listen to doctors and others who warned of the danger of radiation to those in the vicinity, about 40,000 people. As a consequence the Tularosa Basin Downwinders, as they are now known, have suffered unusually high rates of cancer for three generations.

The following are critical scoping issues:

- Transporting high-level waste long distances exposes people and places along the entire route to nuclear contamination due to accidents, terrorist attacks, weather and other things. How to assure safety for so many shipments over so many miles and so long a time - likely 1000 shipments of 1000 to 2000 miles each?
- The permit is only for forty years. After that no ownership. What happens then? Who will be responsible? The waste will remain radioactive for thousands of years; forty years is nothing in this time frame.
- In its present locations the waste is guarded and secured by entities with the need to protect the public. Wouldn't it be much more cost effective and much less risky to leave the waste in place until a permanent storage site is located? Why move the waste twice - once to interim storage and later to permanent storage?
- Despite all assurances, there have been accidents and leaks at WIPP, Los Alamos and elsewhere. 99.9% secure is not good enough.
- In New Mexico and around the country communities of color bear the burden of waste that no one wants. Events around the country show that we are in a new era with regard to communities of color. Has the scoping developed new ways to really listen to communities of color and to address their concerns?

Finally I live within about a mile of I-25, I-40 and the railroad in Albuquerque. Please join me in visualizing what my neighborhood would look like if there were a transportation incident near me and what my health and life going forward would be.

Sincerely,

Sharon Gross

/Holtec071818