

## Holtec-CISFEISCEm Resource

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**From:** Andrea Saunders <a\_jamison@hotmail.com>  
**Sent:** Friday, July 27, 2018 9:57 AM  
**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:

NRC must REJECT Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high-level nuclear waste because Holtec only intends to operate the dump if the Department of Energy and US taxpayers take over ownership of the waste and pay to transport it across the country. This arrangement is NOT allowed under US federal laws.

Tetra Tech cannot be trusted to assess the environmental impacts of the proposed Holtec dump. For 20 years 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 being converted to high-end housing. This is 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 Holtec site VIOLATES ENVIROMENTAL and ECONOMIC JUSTICE. The proposed area has valuable industries including pecan, cattle ranches, dairy, and other local farming interests that would be threatened by the site. Even some of the hazardous and extractive industries that are a big part of the economy oppose the 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.

CASK DANGERS. None of today's certified waste containers are designed for real world transport conditions (temperatures, crash speeds, submersion in deep water) and have not been physically tested despite dump-promoter's misuse of 40 year-old crash-test videos on totally different casks. The storage containers cannot be monitored for potential cracks and leaks, inspected, repaired or replaced even though we know the waste will be dangerous longer than they will last. Moving thousands of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railroad tracks, roads and bridges is dangerous and negatively impacts infrastructure, people, businesses, communities, and resources all along the way.

EMERGENCY RESPONSE. It is irrational to depend 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. 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. Assume increased earthquake risks and other impacts from fracking (which is not prohibited) near and under the site!

CONSOLIDATED "INTERIM" STORAGE (CIS) COULD BECOME PERMANENT. 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, 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.

This type of dump (ISFSI) -- is illegal if title to the waste is shifted to taxpayers and there is no permanent dump operating

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