Holtec-CISFEISCEm Resource

From: Protecting NM From All Things Nuclear <protectnewmexico@gmail.com>
Sent: Tuesday, July 31, 2018 1:48 AM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Docket ID NRC–2018–0052 _ NISG _ PDF 1 of 72
Attachments: NRC–2018–0052_NISG-1.pdf; ATT00001.htm

Nuclear Regulatory Commissioners,

The Nuclear Issues Study Group (NISG) has mailed 3 boxes with a total of 5,112 Public Scoping Comments re: Docket ID NRC–2018–0052. We are emailing the corresponding digital copies (as PDFs 1-72) of the same, hand-signed individual Public Scoping Comments OPPOSING HOLTEC'S PROPOSED CISF AND RELATED TRANSPORT OF HLRW.

Box 1 contains PDFs 1-20.
Box 2 contains PDFs 21-41.
Box 3 contains PDFs 42-72.

This email corresponds to Box 1: PDF 1.

Leona Morgan, Co-Coordinator
Nuclear Issues Study Group
protectnewmexico@gmail.com
+1 505 879 8547

Federal Register Notice: 83FR13802
Comment Number: 3215

Mail Envelope Properties (904AA3A5-4C9A-410E-9926-0DB3A6881636)

Subject: [External_Sender] Docket ID NRC–2018–0052 _ NISG _ PDF 1 of 72
Sent Date: 7/31/2018 1:48:18 AM
Received Date: 7/31/2018 1:48:54 AM
From: Protecting NM From All Things Nuclear

Created By: protectnewmexico@gmail.com

Recipients:

Post Office: gmail.com

Files	**Size**	**Date & Time**
MESSAGE	633	7/31/2018 1:48:54 AM
NRC–2018–0052_NISG-1.pdf	3857452	
ATT00001.htm	1153	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

RE: Docket ID NRC–2018–0052; Holtec International's HI–STORE Spent Fuel Waste Facility

Nuclear Regulatory Commission:

I respectfully submit these scoping comments on the Holtec Environmental Report (ER) to bring up to 100,000 metric tons of spent fuel, high-level radioactive waste, from nuclear reactors around the country to southeast New Mexico. I am submitting the following comments because I do not consent to New Mexico becoming a national radioactive waste dumping ground. I do not consent to transporting up to 10,000 canisters of highly radioactive waste through thousands of communities nationwide. I do not consent to the risk of contamination of our lands, aquifers, air, or the health of plants, wildlife, and livestock. I do not consent to endangering present and future generations.

I formally request a 60-day Extension Of Time For This Comment Period. A 60-day comment period places an undue burden on the public to respond to this 543-page technical document. I formally request additional Public Scoping Meetings for other communities in New Mexico and nationwide that will be impacted by the transport and that any additional meetings have time for the public to make verbal comments to those present.

A thorough Environmental Justice analysis must be complete to consider all possible future impacts from this facility to the local communities and those along transport routes, including but not limited to: economic and health impacts. I also request proper Tribal Consultation for any affected indigenous nations whose people, cultural resources, or sacred places may adversely impacted at the site and along transportation routes.

This Holtec Proposal Is Contrary To Current Law

- Current law only allows the U.S. Department of Energy to take title to commercial spent fuel "following commencement of operation of a repository" or at a DOE-owned and operated monitored retrievable storage facility. The Holtec site meets neither requirement, as it is a private facility.

Holtec Must Remove Copyrights And All Redactions in the Environmental Report

- NRC must require Holtec to produce an ER that has no such copyright restriction and has no redactions.

The Impacts Of Permanent Storage Must Be Analyzed

- The Environmental Report (ER) is inadequate and incomplete because it does not analyze the impacts of the spent fuel being left at the Holtec site indefinitely.

More Alternatives Must Be Analyzed

- Keeping the spent fuel casks in some form of Hardened On Site Storage (HOSS) on the reactor sites must be analyzed.
- The alternative of consolidated storage being done at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) must be analyzed.
- The waste can and should remain on site for many more years and does not need to move until thorough analyses of alternatives are complete.

The Environmental Report inadequately discusses the transportation Risks

- This ER must include all transportation routes and the potential impacts of accidents or terrorism incidents on public health and safety along all the routes.
- The ER is incomplete because it does not discuss how rail shipments from reactors without rail access would be accomplished and the risks and impacts of such shipments.

The Consequences To An Accident-Exposed Individual Must Be Analyzed

- Terms like "collective dose risk" and "person-rem" are used to ignore the potential impacts to a single individual.
- All possible exposures to humans from routine releases from transport casks and site storage must be clearly defined in plain language, for individuals near waste canisters on occasion and workers who are transporting or working at the site long-term.

Cracked And Leaking Canisters Must Be Addressed

- The ER does not analyze exactly how radioactive waste from a cracked and leaking canister would be handled, since there is no wet pool or hot cell at the site.

More Cumulative Impacts Must Be Analyzed

- The ER mentions the Waste Isolation Pilot Plant (WIPP) but does not analyze the impacts of a radiologic release from WIPP on the proposed CIS site.
- The impacts from the local oil and gas industry on the proposed site need to be analyzed.

Seismic Impacts On Stored Casks Must Be Stated

- Although the ER gives a statement on recent seismic activity in the area, there is no analysis of what many 3.0-4.0 fracking-induced earthquakes will have on the buried casks.

Impacts Of Future Railroads And Electric Lines Must Be Analyzed

- The railroads and electric lines are not in place, but must be analyzed.

How many of the estimated 135 jobs will go to locals and how many are only temporary?

- The total number of annual workers at the site could total as many as 135 when short-term, construction jobs are combined with the operating workforce. How many of these jobs will create long-term careers for local communities? How many jobs and careers will benefit local residents?

Sincerely,

Signature _____ Date 5 · 19 · 18

Name (Print) Matthew K. Tafoya

City & State Ft Defiance, AZ 86504

5/13, 2018

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

RE: Docket ID NRC–2018–0052; Holtec International's HI–STORE CIS Facility for Spent Nuclear Fuel, Lea County, New Mexico

NRC:

I respectfully submit these scoping comments on the Holtec Environmental Report (ER) to bring up to 100,000 metric tons of spent fuel, high-level radioactive waste, from nuclear reactors around the country to southeast New Mexico. I am submitting the following comments because I do not consent to New Mexico becoming a national radioactive waste dumping ground. I do not consent to transporting up to 10,000 canisters of highly radioactive waste through thousands of communities nationwide. I do not consent to the risk of contamination of our lands, aquifers, air, or the health of plants, wildlife, and livestock. I do not consent to endangering present and future generations.

I formally request that the comment period be further extended beyond July 30th and that transportation routes be made public and that meeting such as those held in Roswell, Hobbs, Carlsbad, Gallup and Albuquerque be held at both major cities and rural communities along these routes throughout the nation. All U. S. residents and citizens impacted on rail lines, highways and waterways, must have time for community education and public comment.

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Sincerely,

Signed _____

Name (Print) Melina Larozz

City & State Albuquerque, NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

RE: Docket ID NRC–2018–0052; Holtec International's HI–STORE Spent Fuel Waste Facility

Nuclear Regulatory Commission:

I am extremely concerned about the Consolidated Interim Storage (CIS) facility proposed by Holtec International to store up to 100,000 metric tons of high-level radioactive waste in southeast New Mexico. I respectfully submit the following comments regarding the proposal itself and the scope of the Environmental Review and analysis for the Environmental Impact Statement (EIS).

I am submitting these comments because I do not consent to New Mexico becoming a national dumping ground for "spent fuel" from every nuclear reactor in the country. I do not consent to transporting up to 10,000 canisters of highly radioactive waste through communities nationwide. I do not consent to the risk of contamination of our lands, aquifers, air, or the health of our people, plants, wildlife, and livestock. I do not consent to endangering present and future generations.

I formally request additional Public Scoping Meetings for other communities throughout the United States (U.S.) that will be impacted by the transport of these waste canisters.

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The Impacts Of Permanent Storage Must Be Analyzed

- The ER is incomplete because it does not analyze the impacts of the spent fuel being left at the Holtec site indefinitely. The EIS needs to include an analysis of the impacts of permanent storage should the CIS facility become a de facto permanent waste site.

More Alternatives Must Be Analyzed

- The high-level radioactive waste is too dangerous to move and can remain on site for many more years. It should not be moved until all alternatives are analyzed, including keeping the waste where it is in some form of Hardened On Site Storage (HOSS) on the reactor sites or at suitable locations as close to the reactors as possible to minimize transport risks.
- The alternative of consolidated storage at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) must also be analyzed.

All Transportation Routes And Risks Must Be Analyzed

- The EIS must include all possible transportation routes and study the potential impacts from accidents, terrorism incidents, and how new rail lines or roads for waste shipments will impact public health, environment, water sources, flora, fauna (especially any endangered species), and occupational safety along these routes.

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- The ER mentions the Waste Isolation Pilot Plant (WIPP) but does not analyze the impacts of a radiologic release from WIPP on the proposed CIS site.
- The impacts from WIPP and possible impacts from and to the local oil and gas industries need to be analyzed and included in the EIS.

Seismic Impacts On Stored Casks Must Be Stated

- Although the ER gives a statement on recent seismic activity in the area, there is no analysis of what fracking-induced earthquakes will have on the buried casks. These impacts need to be analyzed and included in the EIS.

Future Electrical Transmission Lines And Other Infrastructure Must Be Analyzed

- Impacts from new electrical lines, surface and subsurface projects must be included in EIS.

Economic Impacts Must Be Analyzed For The Different Phases Of The Project

- The economic impacts must be studied and clearly state any positive or negative impacts from this site: initially, after construction is complete, and throughout the whole 120 years.
- How many jobs will be created? How many are only temporary and how many are permanent? How may will go to local residents?

A Thorough Environmental Justice (EJ) Analysis Must Be Included In The EIS

- Impacts to EJ communities near the site and along transport routes must be studied, including but not limited to economic and health impacts that are specific to lower income and people of color communities. For indigenous populations located near the site or along transport routes, this EJ analysis must include impacts to culturally important natural resources, such as: sacred places, traditional food sources, and traditional medical plants.

Sincerely,

Signature Donna J Griffin Date 6/23/2018

Name (Print) DONNA GRIFFIN

City & State Albuquerque NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

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Sincerely,

Signature _____ Date 23 Jun 18

Name (Print) LEE CUELLAR

City & State Albuquerque, NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

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Sincerely,

Signature _____ Date 6/23/18

Name (Print) Rosalyandra Asneros

City & State Albuquerque NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

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Sincerely,

Signature Roxann Rodriguez Date 6/23/17

Name (Print) Roxann Rodriguez

City & State San Antonio, TX

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

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Sincerely,

Signature Isaiah Z. Date 6/23/18

Name (Print) Isaiah Zeilman

City & State New Mexico, Albuquerque

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

RE: Docket ID NRC–2018–0052; Holtec International's HI–STORE Spent Fuel Waste Facility

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Signature Caedmon Holland Date 06/23/18

Name (Print) Caedmon Holland

City & State Albuquerque NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
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Signature Rachael England Date 6/23/18

Name (Print) Rachael England

City & State Albuquerque, New Mexico

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
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Sincerely,

Signature Matthew Shepard Date 6 22 18

Name (Print) Matthew Shepard

City & State ~~AL~~ SANDIA PARK NM

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Signature Paul Rivera Date 6/23/2018

Name (Print) _____

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Name (Print) Jackie Hertel

City & State Albuquerque, NM 87110

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Sincerely,

Signature Eden Resrik Date June 23 2018

Name (Print) Eden Resrik

City & State Albuquerque, New Mexico

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

RE: Docket ID NRC–2018–0052; Holtec International's HI–STORE Spent Fuel Waste Facility

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Signature _____ Date Jan 23, 2018

Name (Print) LUKE RESNIK

City & State Albuquerque NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

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Signature _____ Date 6/23/18

Name (Print) Katherine Poege

City & State Albuquerque, NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

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Sincerely,

Signature Sandra Cleisz Date 6/23/18

Name (Print) SANDRA CLEISZ

City & State Albuquerque NM 87106

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

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Signature _____ Date 6/23/18

Name (Print) Iabatha Bennett

City & State Albuquerque, NM

May Ma
Office of Administration
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Signature Jacob Vanbeek Date 6/23/18

Name (Print) Jacob Vanbeek

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Attempts at mitigating radioactive waste water have failed from dumping its abandoned mine to incadescent vessels dumped on the scale. Our best engineering is not infallible and never can.

Sincerely, PO Box 2 Albuquerque NM 87103

Signature [signature] Date 6/23/18 Respectfully

Name (Print) Thomas R Holland

City & State Albuquerque NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
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Signature Meredith Cherven-Holland Date 6-23-2018

Name (Print) Meredith Cherven-Holland

City & State Albuquerque, New Mexico

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

RE: Docket ID NRC–2018–0052; Holtec International's HI–STORE Spent Fuel Waste Facility

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Signature Charla G. Henley Date 6/23/2018

Name (Print) Charla E. Henley

City & State Albuquerque, NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
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Signature Rebecca Hathaway Allen Date 6-23-18

Name (Print) REBECCA HATHAWAY ALLEN

City & State Albuquerque, New Mexico

May Ma
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Mail Stop: TWFN–7– A60M
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Signature _____ Date 6/23/2018

Name (Print) Ariel C. Wilson

City & State ABQ, NM

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Signature _____ Date 6/23/18

Name (Print) Henry Rael

City & State 1235 Sunset SW 87105

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Office of Administration
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Sincerely,

Signature [signature] Date 6/23/18

Name (Print) Karen Michelle Otero

City & State Albuquerque, NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

RE: Docket ID NRC–2018–0052; Holtec International's HI–STORE Spent Fuel Waste Facility

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Signature Tonya Cly Date 6-23-18

Name (Print) TONYA CLY

City & State Albuquerque NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
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Signature _____ Date 6/28/18

Name (Print) ERIN G. NUAREZ

City & State ABQ, NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
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Washington, DC 20555– 0001

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Signature _____ Date 6/23/18

Name (Print) Rebecca Schlosser

City & State Albuquerque, NM

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Office of Administration
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Signature Michael D Porter Date 6/23/2015

Name (Print) Michael D Porter

City & State Albuquerque, NM

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Signature _____ Date 6/23/18

Name (Print) Geri Everett

City & State ABQ NM 87114

May Ma
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Name (Print) Adrian Orozco

City & State Albuquerque, NM

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Sincerely,

Signature _____ Date 23 JUN 15

Name (Print) Xavier Fadeev

City & State ABQ. NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

RE: Docket ID NRC–2018–0052; Holtec International's HI–STORE Spent Fuel Waste Facility

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Sincerely,

Signature Lia Driscoll Date 6/22/18

Name (Print) Lia Driscoll

City & State Carbondale, IL

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

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Signature _____ Date 6/23/18

Name (Print) Jessica Villasenor

City & State Albuquerque, NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
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Name (Print) Robert Duncan

City & State ABQ, NM

May Ma
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Name (Print) CYNTHIA DORSCH

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Name (Print) VERNA TELLER

City & State ALBQ, N MEX. 87105

May Ma
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Sincerely,

Signature _____ Date 6/23/18

Name (Print) Daniel Gardunio

City & State Albuquerque, NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

RE: Docket ID NRC–2018–0052; Holtec International's HI–STORE Spent Fuel Waste Facility

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Signature _____ Date 6/23/18

Name (Print) Charles Peterson

City & State Albuquerque, NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

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Sincerely,

Signature JoAnn Smith Date 6/23/18

Name (Print) JoAnn Smith

City & State Albuquerque, NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

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Signature Nelly Taveras Date 6/23/18

Name (Print) Nelly Taveras

City & State ALBUQUERQUE, NM

May Ma
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Signature _____ Date 6/23/18

Name (Print) JOHN AMOS

City & State Albuquerque, NM

May Ma
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Name (Print) Nash Jones

City & State Albuquerque, New Mexico

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Signature Kelly Bull Date 6/23/18

Name (Print) Kelly Bull

City & State Albuquerque, NM, 87108

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555– 0001

RE: Docket ID NRC–2018–0052; Holtec International's HI–STORE Spent Fuel Waste Facility

Nuclear Regulatory Commission:

I am extremely concerned about the Consolidated Interim Storage (CIS) facility proposed by Holtec International to store up to 100,000 metric tons of high-level radioactive waste in southeast New Mexico. I respectfully submit the following comments regarding the proposal itself and the scope of the Environmental Review and analysis for the Environmental Impact Statement (EIS).

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Signature Erik Playe Date 6/23/18

Name (Print) Erik Playe

City & State ABQ NM

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Office of Administration
Mail Stop: TWFN–7– A60M
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Washington, DC 20555– 0001

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Signature _____ Date 6/23/18

Name (Print) Mercedes Ortega-Kennedy

City & State Las Vegas NM 87701

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
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Washington, DC 20555– 0001

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Signature _____ Date 6/23/18

Name (Print) Jasmine Ross Robinson

City & State Santa Fe NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
U.S. Nuclear Regulatory Commission
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Name (Print) Ruchi Das

City & State San Antonio, TX

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
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Signature Irene Gotz Date 6/23/15

Name (Print) Irene Gotz

City & State Albuquerque, NM

May Ma
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Mail Stop: TWFN–7– A60M
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Signature Warren J. Brousard, Jr. Date 6/23/18

Name (Print) WARREN J. BROUSSARD

City & State Abq NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
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- The alternative of consolidated storage at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) must also be analyzed.

All Transportation Routes And Risks Must Be Analyzed

- The EIS must include all possible transportation routes and study the potential impacts from accidents, terrorism incidents, and how new rail lines or roads for waste shipments will impact public health, environment, water sources, flora, fauna (especially any endangered species), and occupational safety along these routes.

The Consequences To An Accident-Exposed Individual Must Be Analyzed

- Terms like "collective dose risk" and "person-rem" are used to ignore the potential impacts to a single individual.
- All possible human exposures from routine and accidental radioactive releases during transport and at the site must be clearly defined in plain language, for individuals near waste on occasion and workers who are transporting or working at the CIS site long-term.

Cracked And Leaking Canisters Must Be Addressed

- The ER does not analyze exactly how radioactive waste from a cracked and leaking canister would be handled, since there is no wet pool or hot cell at the site. The EIS must include how cracked and leaking canisters will be handled onsite and during transport and analyze possible environmental impacts if leaks or spills occur from cracked canisters.

More Cumulative Impacts Must Be Analyzed

- The ER mentions the Waste Isolation Pilot Plant (WIPP) but does not analyze the impacts of a radiologic release from WIPP on the proposed CIS site.
- The impacts from WIPP and possible impacts from and to the local oil and gas industries need to be analyzed and included in the EIS.

Seismic Impacts On Stored Casks Must Be Stated

- Although the ER gives a statement on recent seismic activity in the area, there is no analysis of what fracking-induced earthquakes will have on the buried casks. These impacts need to be analyzed and included in the EIS.

Future Electrical Transmission Lines And Other Infrastructure Must Be Analyzed

- Impacts from new electrical lines, surface and subsurface projects must be included in EIS.

Economic Impacts Must Be Analyzed For The Different Phases Of The Project

- The economic impacts must be studied and clearly state any positive or negative impacts from this site: initially, after construction is complete, and throughout the whole 120 years.
- How many jobs will be created? How many are only temporary and how many are permanent? How may will go to local residents?

A Thorough Environmental Justice (EJ) Analysis Must Be Included In The EIS

- Impacts to EJ communities near the site and along transport routes must be studied, including but not limited to economic and health impacts that are specific to lower income and people of color communities. For indigenous populations located near the site or along transport routes, this EJ analysis must include impacts to culturally important natural resources, such as: sacred places, traditional food sources, and traditional medical plants.

Sincerely,

Signature Sheryl Spangler Date 6/23/18

Name (Print) Sheryl Spangler

City & State Albuquerque NM