

## Holtec-CISFEISCEm Resource

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**From:** Protecting NM From All Things Nuclear <protectnewmexico@gmail.com>  
**Sent:** Tuesday, July 31, 2018 2:10 AM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 25 of 72  
**Attachments:** NRC-2018-0052\_NISG-25.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 2: PDF 25.**

Leona Morgan, Co-Coordinator  
Nuclear Issues Study Group  
[protectnewmexico@gmail.com](mailto:protectnewmexico@gmail.com)  
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**Federal Register Notice:** 83FR13802  
**Comment Number:** 3241

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**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 25 of 72  
**Sent Date:** 7/31/2018 2:09:39 AM  
**Received Date:** 7/31/2018 2:10:23 AM  
**From:** Protecting NM From All Things Nuclear

**Created By:** protectnewmexico@gmail.com

**Recipients:**

**Post Office:** gmail.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	634	7/31/2018 2:10:23 AM
NRC-2018-0052_NISG-25.pdf		3381725
ATT00001.htm	496	

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**Priority:** Standard  
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**Reply Requested:** No  
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**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:

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Sincerely,

Signature     *Jacqueline M. Wenner*     Date     5/26/18    

Name (Print)     *Jacqueline M. Wenner*    

City & State     *ABQ, NM 87105*

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Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Signature



Date

5/26/18

Name (Print)

David Hunter

City & State

Albuquerque, NM

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Signature Laurie Cullinan Date 5-26-18

Name (Print) Laurie Cullinan

City & State Albuquerque, NM



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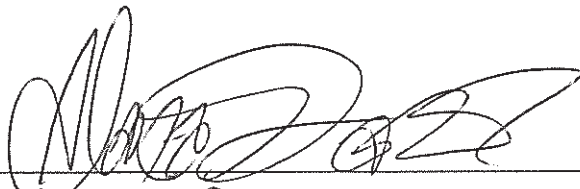
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5.26.2018

Name (Print)

Alana Garcia Lopez

City & State

Albuquerque NM

May Ma  
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Name (Print) Roxi PADRID

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Sincerely,

Signature Marcus Lieberman Date 5/26/18

Name (Print) Marcus Lieberman

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 June Krumpotick Date 5/20/18

Name (Print) June Krumpotick

City & State ABQ, 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 Carol Rutenberg Date 5/26/18

Name (Print) Carol Rutenberg

City & State ABQ, 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 Eileen Bidwell Date 5-26-18

Name (Print) Eileen Bidwell

City & State Reno NV

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature Janet F Hevey Date 5/26/2018

Name (Print) Janet F Hevey

City & State Albuquerque, New Mexico

May Ma  
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Signature Joan Schumann Date 5/26/18

Name (Print) Joan Schumann

City & State Houston, TX



May Ma  
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Name (Print) Jeanie Hearty

City & State Wakee, NJ 07672

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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 Diane Fentress Date 5/26/18

Name (Print) DIANE FENTRESS

City & State Albuquerque NM

May Ma  
Office of Administration  
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Sincerely,

Signature

*Pamela S. Brown*

Date

*May 26, 2018*

Name (Print)

*PAMELA S. BROWN*

City & State

*Albuquerque, NM*

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Sincerely,

Signature  Date 5/26/18

Name (Print) Jennifer Hunt Hatcher

City & State Philadelphia, PA



May Ma  
Office of Administration  
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Signature Stephen D. Horton Date 5/26/2018

Name (Print) Stephen D. Horton

City & State Philadelphia, Pa.

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Name (Print) Sarah Benavidez

City & State Albuquerque, NM

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Name (Print) Andrea Sattui

City & State Long Beach, CA

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Signature Maria E. Lopez Date 05/26/2018

Name (Print) Maria E. Lopez

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 5/26/18

Name (Print) Melinda Montes

City & State Compton, CA

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

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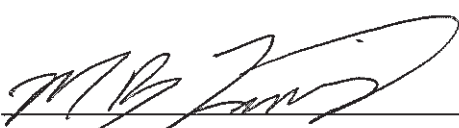
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Sincerely,

Signature  Date May 26, 2018

Name (Print) M.B. Lewis

City & State Amarillo, TX

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

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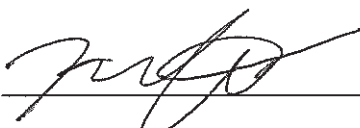
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Sincerely,

Signature  Date 5/26/2013

Name (Print) Kimberly Clatt

City & State Albuquerque NM

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Name (Print) Mario Casillas

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May Ma  
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Name (Print) Vivian Taylor

City & State ABQ NM

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Sincerely,

Signature Melanie King Date 5-26-18

Name (Print) Melanie King

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 5/26/18

Name (Print) JAMES P AHREND

City & State Albuquerque, N.M.

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

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New Mexico has enough nuclear waste already!

Sincerely,

Signature Walker Martin Date 5/26/18

Name (Print) Walker Martin

City & State Albuquerque, NM



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature Stephen Wade Date 5-26-18

Name (Print) STEPHEN WADE

City & State Albuquerque, NM

May Ma  
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U.S. Nuclear Regulatory Commission  
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Signature LINPA Bennett      Linpa Bennett      Date 12 26-18

Name (Print) ↓      ↓

City & State Albuquerque, N.M. 87108

May Ma  
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Signature Debra Jordan Date 5/26/18

Name (Print) Debra Jordan

City & State Albuquerque, NM

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Sincerely,

Signature Catherine V Lopez Date 5-26-18

Name (Print) Catherine V. Lopez

City & State Albuquerque, N.M 87121



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:

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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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- 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.

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- 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.

**The Consequences To An Accident-Exposed Individual Must Be Analyzed**

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Sincerely,

Signature  Date 5-26-18

Name (Print) CATHERINE TAYLOR

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 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**

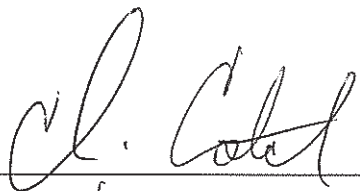
- The railroads and electric lines are not in place, but must be analyzed.

**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

5/26/18

Name (Print)

Chris Catechis

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:

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Sincerely,

Signature



Date

5/26/18

Name (Print)

City & State

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

5/26/2018

Name (Print)

Richard Abeza de Jara

City & State

Albuquerque, NM 87102



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 5/26/2018

Name (Print) Robert Mosher

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 05/26/18

Name (Print) KENDRA DUNCAN

City & State RIORANCHO, 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

Valerie Serna

Date

5/26/18

Name (Print)

Valerie Serna

City & State

Albuquerque, NM

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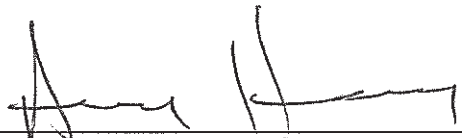
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Sincerely,

Signature



Date

5-26-18

Name (Print)

Amy Harvey

City & State

Tijeras, 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

*Nicole Harvey - Navajo*

Date

*May 26 2018*

Name (Print)

*Nicole Harvey - Navajo*

City & State

*P. Las Cruces, New Mexico*

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature Eric Sarb Date 5/26/18

Name (Print) Eric Sarb

City & State San Francisco, CA

May Ma  
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Name (Print) Ginger Quinn

City & State Albuquerque, NM

May Ma  
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City & State

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Sincerely,

Signature *Ejisa Chavez* Date 5/26

Name (Print) Ejisa Chavez

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 Mark Myers Date 05/26/18

Name (Print) MARK MYERS

City & State PLACITAS, NM

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Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature Lewis Casey Date 5/26/2018

Name (Print) Lewis Casey

City & State Albuquerque New Mexico 87108

May Ma  
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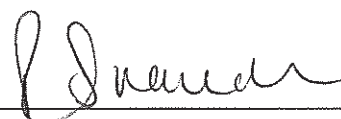
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Date

5/26/2018

Name (Print)

Rachel Saavedra

City & State

Placitas, NM



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