

## Holtec-CISFEISCEm Resource

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**From:** Protecting NM From All Things Nuclear <protectnewmexico@gmail.com>  
**Sent:** Tuesday, July 31, 2018 2:54 AM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 54 of 72  
**Attachments:** NRC-2018-0052\_NISG-54.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 3: PDF 54.**

Leona Morgan, Co-Coordinator  
Nuclear Issues Study Group  
[protectnewmexico@gmail.com](mailto:protectnewmexico@gmail.com)  
+1 505 879 8547

**Federal Register Notice:** 83FR13802  
**Comment Number:** 3272

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**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 54 of 72  
**Sent Date:** 7/31/2018 2:54:08 AM  
**Received Date:** 7/31/2018 2:54:39 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 2:54:39 AM
NRC-2018-0052_NISG-54.pdf		3340377
ATT00001.htm	496	

**Options**

**Priority:** Standard  
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**Reply Requested:** No  
**Sensitivity:** Normal  
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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:

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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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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Sincerely,

Signature  Date 7/28/18

Name (Print) Christine Hwang

City & State Brooklyn, NY

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 Merrill Tracey Date 7-28-18

Name (Print) Merrill Tracey

City & State Albuquerque, NM

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature *Janice Condelade* Date 7/27/18  
Name (Print) Janice Condelade  
City & State Altoona



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

7/27/18

Name (Print)

Gregory K Baca

City & State

Alb, NM

May Ma  
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Name (Print) Samuel Anderson

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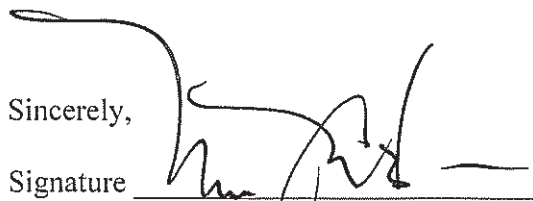
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Signature \_\_\_\_\_ Date 7/27/18

Name (Print) MARIA C MONTAYA

City & State Los Ranchos, 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 7/27/18

Name (Print) ZACH SELL

City & State ALBUQUERQUE NM



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Signature Elvira Bueno Date 7/27/18

Name (Print) Elvira Bueno

City & State AIB New Mexico

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Signature Auberon Tsinknahjinie Date 7/27/18

Name (Print) Auberon Tsinknahjinie

City & State ABQ NM

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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7-27-18

Name (Print)

ADRIAN ARMENDARIZ

City & State

Albuquerque NM



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature Mary Singleton Date 7/27/18

Name (Print) Mary Singleton

City & State Albuquerque, NM

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Sincerely,

Signature

*Jon Spar*

Date

*7/27/18*

Name (Print)

*JON SPAR*

City & State

*Alb 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 Andrew Zacarias Date 7/27/18

Name (Print) Andrew Zacarias

City & State Albuquerque NM

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Signature Teresa M Drenten Date 7/29/18

Name (Print) Teresa Drenten

City & State Albuquerque, NM



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature Adam Ruler Date 7/27/18

Name (Print) Adam Fischler

City & State Albuquerque, NM

May Ma  
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Name (Print) Danisha Romero

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Name (Print)

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City & State

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- 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 Plumbing Infrastructure Must Be Analyzed**

- Impacts from new electrical lines and plumbing 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

*Brittney Hurston*

Date

*7/28/18*

Name (Print)

*Brittney Hurston*

City & State

*Alb, NM*



July 28, 2018

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**

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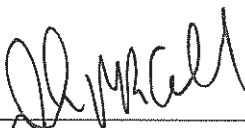
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Signed \_\_\_\_\_



Name (Print) \_\_\_\_\_

John McCall

City & State \_\_\_\_\_

500 oak st NE, Suite 108 Albuquerque NM 87106

July 28, 2018

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

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Sincerely,

Signed



Name (Print)

Shantaw Rodriguez

City & State

Rio Rancho, New Mexico

July 28, 2018

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

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Sincerely,

Signed 

Name (Print) Melissa Peña

City & State Albuquerque, NM

7.28, 2018

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**

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Name (Print)

Nikki Peterson

City & State

Albuquerque, N.M.



7, 28, 2018

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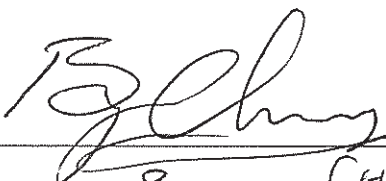
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Sincerely,

Signed



Name (Print)

BRYAN CURRAN

City & State

San Francisco, California

June 28 2018

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 and additional reprocessing waste—high-level radioactive waste—from nuclear reactors around the country to southeastern New Mexico for consolidated interim storage (CIS). I am submitting the following comments because **I do not consent to New Mexico becoming a national radioactive waste dump**. I do not consent to transporting up to 10,000 shipments of highly radioactive waste through thousands of communities nationwide to New Mexico with possibly another 10,000 shipments later to some as yet unknown repository. The transportation phase alone is reckless and the communities along the transportation routes are not adequately prepared to respond to a radioactive accident of this potential magnitude.

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Sincerely,

Signed Camilla John-Barr

Name (Print) Camilla John-Barr

City & State Brooklyn, NY

It's bad news!

7.28, 2018

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**

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Sincerely,

Signed Kevin Kundracik

Name (Print) Kevin Kundracik

City & State ABQ NEW MEXICO

June 29, 2018

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**

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Sincerely,

Signed Michelle Cappella

Name (Print) Michelle Cappella

City & State Phoenix, AZ



7.28, 2018

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**

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Name (Print)

Michael W. Rankin

City & State

Albuquerque, NM

7/28, 2018

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**

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Signed 

Name (Print) RITA TREE

City & State ABQ NM

7.28, 2018

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

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Signed 

Name (Print) D. Preciado

City & State Albq 87104

7.28, 2018

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

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Sincerely,

Signed Madeleine Albee

Name (Print) Madeleine Albee

City & State Newtown, C.T.



7.28, 2018

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

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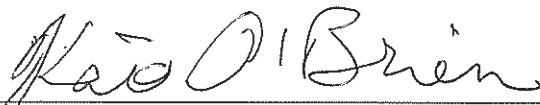
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Name (Print)

KAIT O'BRIEN

City & State

NEW YORK, NEW YORK

7/28, 2018

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

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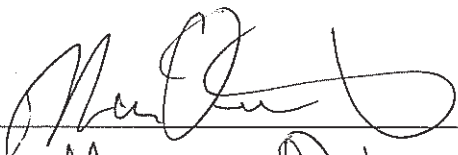
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 Name (Print)     Mariah Ortega      
 City & State     Albuquerque NM

7.28, 2018

Office of Administration  
Mail Stop: TWFN-7- A60M  
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Name (Print)

VIRGINIA QUINN

City & State

Albuquerque, NM

7/26, 2018

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

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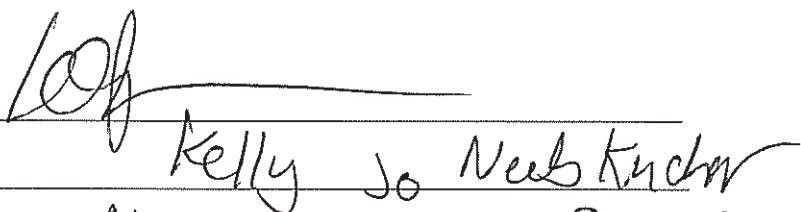
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Sincerely,

Signed \_\_\_\_\_



Name (Print) \_\_\_\_\_

Kelly Jo Neels Knicker

City & State \_\_\_\_\_

Albuquerque, NM 87107



7-28, 2018

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**

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Sincerely,

Signed   
Name (Print) Abigail Kuchez  
City & State Albuquerque, New Mexico

July 28, 2018

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

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Name (Print) Jade Clark

City & State Albuquerque, NM 87111

July 28, 2018

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

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Name (Print) Daniel Mallea

City & State Albuquerque, NM 87105

July 28, 2018

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

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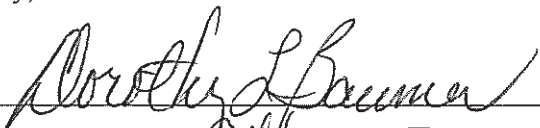
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 Name (Print) Dorothy L Baumer  
 City & State Placitas NM



July 28, 2018

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

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Sincerely,

Signed



Name (Print)

Melissa Fang

City & State

ABQ, NM.

July 25, 2018

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**

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Signed Yvonne Tafoya  
Name (Print) Yvonne Tafoya  
City & State Albuquerque NM

July 28, 2018

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

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Sincerely,

Signed       Addie D      

Name (Print)       Addie Draper      

City & State       Mountainair NM

June 28, 2018

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**

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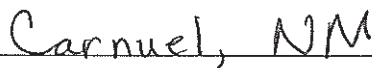
Signed \_\_\_\_\_



Name (Print) \_\_\_\_\_



City & State \_\_\_\_\_





July 28, 2018

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**

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Signed By: Jan Eric Poteete  
Name (Print) Jan Eric Poteete  
City & State Albuquerque, NM

June 28, 2018

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

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- This analysis must be extended to current industries and agriculture along the transportation routes to see what effects an accident with and without a release would have on those local economies.

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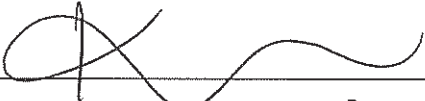
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Sincerely,

Signed   
Name (Print) KENDRA DUNLAN  
City & State ALBUQUERQUE, NM

July 28, 2018

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 and additional reprocessing waste—high-level radioactive waste—from nuclear reactors around the country to southeastern New Mexico for consolidated interim storage (CIS). I am submitting the following comments because **I do not consent to New Mexico becoming a national radioactive waste dump.** I do not consent to transporting up to 10,000 shipments of highly radioactive waste through thousands of communities nationwide to New Mexico with possibly another 10,000 shipments later to some as yet unknown repository. The transportation phase alone is reckless and the communities along the transportation routes are not adequately prepared to respond to a radioactive accident of this potential magnitude.

Holtec's application is for up to 120 years with a high possibility of waste remaining for at least 300 years. By that time the fragile, thin-walled containers will mostly likely be too delicate to move leaving all the nation's high level waste in a permanent, shallow landfill. The only benefit to New Mexico appears to be about 55 long-term jobs.

A public process at least as robust as that for the Yucca Mountain facility must be undertaken as the transportation routes go through most congressional districts, many major metropolitan areas, large amounts of agricultural land and environmental justice communities. Public scoping meetings must be held along the transportation routes including in the more than 20 cities through which this waste will be shipped.

Geological and hydrological investigations at least as robust and comprehensive as those for the Waste Isolation Pilot Plant (WIPP) must be undertaken as the site is a complex geological area with earthquakes, many natural resources, and karst formations including massive sinkholes. Those investigations were many and took years. Even if WIPP is sited on an island of non-karst in the middle of one of the largest karst areas in the world, the likelihood that Holtec is also sited in such a so-called safe area is remote; much more needs to be known about the geology and hydrology of the Holtec site before we can be sure it is safe. The studies for Holtec more resemble studies for a local gas station than those for a site planning to store and possibly dispose the most-deadly wastes in the entire nuclear fuel cycle.

Because the site is in one of the most heavily developed oil and gas areas in the country, the effects of fracking on the site, including a possible increase in man-made earthquakes must also be extensively studied.

**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.
- There is no current repository and it could be hundreds of years before one is created. In fact, there might never be a site chosen for this waste outside of New Mexico. Though New Mexico was promised that high level waste would never come to WIPP, WIPP could become that repository and already has modifications requests underway to increase its size and to allow it to accept high level waste.

**The Impacts Of Permanent Indefinite Storage (De Facto Disposal) 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 Environmental Report inadequately discusses the Transportation Risks

- This ER must include all transportation routes and the potential impacts of accidents or terrorism incidents on the environment, public health and safety along all the routes.
- The ER is inadequate and 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.
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### Economic Effects On Current New Mexico Industry And Agriculture Must Be Analyzed

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Signed P. McMahally

Name (Print) Peggy McMahally

City & State Albuquerque NM

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Sincerely,

*This one of humankinds Biggest Mistakes !!*

Signed Joanna Berman

Name (Print) JOANNA BERMAN

City & State Albuquerque NM



