Holtec-CISFEISCEm Resource

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 55 of 72
Attachments: NRC–2018–0052_NISG-55.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 55.

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

Federal Register Notice: 83FR13802
Comment Number: 3273

Mail Envelope Properties (1AF980E4-F287-4C59-94DA-F69446FF733C)

Subject: [External_Sender] Docket ID NRC–2018–0052 _ NISG _ PDF 55 of 72
Sent Date: 7/31/2018 2:54:17 AM
Received Date: 7/31/2018 2:54:52 AM
From: Protecting NM From All Things Nuclear

Created By: protectnewmexico@gmail.com

Recipients:

Post Office: gmail.com

Files	**Size**	**Date & Time**
MESSAGE	634	7/31/2018 2:54:52 AM
NRC–2018–0052_NISG-55.pdf	2865747	
ATT00001.htm	496	

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

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.

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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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Sincerely,

Signed _____

Name (Print) Catherine Strickland

City & State Cherrow, NC

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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Sincerely,

Signed _____

Name (Print) Brandy Montoya

City & State Artesia, 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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Sincerely,

Signed Melissa

Name (Print) Melissa Pedroza

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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Name (Print) Heather Flores

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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Name (Print) Fallon Baeder

City & State ABQ, NM

7/28, 2018

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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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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.

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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

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Sincerely,

Signed Charles Cummings

Name (Print) Charles Cummings

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

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Sincerely,

Signed _____

Name (Print) JP SALAZAR

City & State LAS CRUCES, 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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Sincerely,

Signed Claire Cooley

Name (Print) Claire Cooley

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 Linda Lee

Name (Print) Linda Lee

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

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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- Terms like "collective dose risk" and "person-rem" are used to ignore the potential impacts to a single individual.
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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 Janet C. Jenkins Date 7/9/18

Name (Print) JANET C. JENKINS

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 Sue Hermes Date 7/8/18

Name (Print) Sue Hermes

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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Sincerely,

Signature _____ Date 7/7/18

Name (Print) Sandra S. Timmerman

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 7/7/18

Name (Print) Richard van Schouwen

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 Cynthia Timmerman Date 7/6/18

Name (Print) Cynthia Timmerman

City & State Albuquerque, N.M.

April 18, 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

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Sincerely,

Signed Ed Tavasci

Name (Print) Ed Tavasci

City & State Albuquerque, NM.

April 18, 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

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Sincerely,

Signed Michael K. Swick

Name (Print) Michael K. Swick

City & State Los Ranchos NM 87107

April 18, 2018

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

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Name (Print) Robert Aly

City & State Albuquerque, NM 87105

April 18, 2018

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

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Name (Print) STEPHEN MILLS

City & State PLACITAS, NEW MEXICO

April 18, 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 a 60-day Extension Of Time For This Comment Period. A 60-day comment period places an undo burden on the public to respond to this 543-page technical document. In addition, this overlaps several other comment periods in New Mexico, including three comment periods for the Waste Isolation Pilot Plant (WIPP) and one for Los Alamos National Laboratory.

I formally request that each of the 3 scheduled meetings have time for the public to make verbal comments to those present, not just a recording, including at the Roswell Open House. I also request additional Public Scoping Meetings for other New Mexico communities that will be impacted by the transport, including but not limited to: Albuquerque, Clovis, and Gallup.

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 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 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.

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.

Cracked And Leaking Casks 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 WIPP but does not analyze the impacts of a radiologic release from WIPP on the proposed CIS site.

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?

- The total number of annual workers at the site could total as many as 135 when construction jobs are combined with the operating workforce.

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.

Sincerely,

Signed David V. Barbour

Name (Print) David V. Barbour

City & State Albuquerque, NM 87112

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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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.

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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

- 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.

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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 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 _____ Date 03/16/18

Name (Print) Rafael Martinez

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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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.

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- 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.

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- 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.

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- 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 07/16/18

Name (Print) Froilan Orozco

City & State Albuquerque, New Mexico

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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) Sam Dee

City & State Montezuma Creek UT 84534

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

Signature _____ Date 6/23/18

Name (Print) Tia Folgheratier

City & State Tuba City, AZ

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

Signature Liam Hall Date 6/21/18

Name (Print) Liam Hall

City & State Greensboro, NC

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

Signature _____ Date 6/20/18

Name (Print) CECILIA CHAVEZ BELTRÁN

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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Sincerely,

Signature Noreen Shaughnessy Date 6-20-18

Name (Print) Noreen Shaughnessy

City & State St Paul MN

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 Eleanor Chavez Date 6-21-18

Name (Print) ELEANOR CHAVEZ

City & State ASQ NM 87121

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 5/22/18

Name (Print) Tomu Radillo

City & State Alb NM

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
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Signature Yahaira Carreras Cubillas Date 6/21/19

Name (Print) Yahaira Carreras Cubillas

City & State Albuquerque, NM

May Ma
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Signature _____ Date June 21, 2018

Name (Print) Beva Sanchez-Padilla

City & State ABQ. NM 87106

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
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Signature _____ Date 6-22-18

Name (Print) Richard Glover

City & State Alpine TX

May Ma
Office of Administration
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Signature _____ Date 06/23/18

Name (Print) Mario Atencio

City & State Torreon, 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 06/23/18

Name (Print) Christina R. Big

City & State Chinle, AZ

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 Paul Atencio, Sr Date 06-23-18

Name (Print) Paul Atencio, Sr.

City & State Cuba N.M. 87013-1268

May Ma
Office of Administration
Mail Stop: TWFN–7– A60M
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Signature [illegible] Date 6/23/18

Name (Print) Hailey Nezie

City & State Dilkon, Arizona

May Ma
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Name (Print) Tenzin Yangkey

City & State Durham, NC

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- 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.
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- 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 _____ Date 6/23/18

Name (Print) Elena Snyder

City & State La Jara 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.

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 (ER)

- NRC must require Holtec to produce an ER that has no such copyright restrictions and has no redactions. It is impossible to make recommendations on the scope of analyses of these redacted areas of the ER for the EIS.

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.

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.

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Time to stop this potential devastation
& focus on solar + wind!!

Sincerely,

Signature Tracy Niven-Fairchild Date 6/23/18

Name (Print) Tracy Niven-Fairchild

City & State La Jara, NM

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

Name (Print) Sarana Riggs

City & State Tuba City, Arizona

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

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Name (Print) Dustin Wero

City & State Tuba City, Arizona