#### **Holtec-CISFEISCEm Resource**

**Sent:** Tuesday, July 31, 2018 3:07 AM **To:** Holtec-CISFEIS Resource

**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 65 of 72

**Attachments:** NRC–2018–0052\_NISG-65.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 65.

Leona Morgan, Co-Coordinator Nuclear Issues Study Group protectnewmexico@gmail.com +1 505 879 8547 Federal Register Notice: 83FR13802

Comment Number: 3283

Mail Envelope Properties (B8170FFB-7639-4C00-87EA-779A36D2A7AD)

Subject: [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 65 of 72

**Sent Date:** 7/31/2018 3:07:04 AM **Received Date:** 7/31/2018 3:07:47 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 3:07:47 AM

NRC-2018-0052\_NISG-65.pdf 3658237

ATT00001.htm 496

**Options** 

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal

Expiration Date: Recipients Received:

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

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Signature Buban Course	Date 6/21/2018
Name (Print) Barbara Conroy	/ /
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City & State Santa De NM 87501	· · · · · · · · · · · · · · · · · · ·

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Sincerely,	
Signature Andy Klunger	Date 6-25-18
Name (Print) Janda (Judith)	Klinger
,	
City & State Santa Fe, NM	8730/

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City & State Sourta fe, NM			

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Name (Print) Gabriel Hanson
City & State Saxte Fe, NM 87507

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Signature	Date 15/18
Name (Print) fanadeo J. Orti-	
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Sincerely,	7-00001	Λ.	an and
Signature	My Mull	Date/ \/ \/ \/ \/	NO 0010
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RE: Docket ID NRC-2018-0052; Holtec International's HI-STORE Spent Fuel Waste Facility

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Sincerely,		1/2/18
Signature / / Signature	Date	6/20/10
Name (Print) No M Gallegy		•
City & State Aby NM		

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

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Name (Print) / Robert Cepllogs	, Manuscapp	
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Signature Wester a	Date 6-30-18
Name (Print) ATRED WELSBERG	
City & State SANTA to NM	87501

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Signature Date_	46/20/2	79
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City & State MOSTN,	<b>→</b>	

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Signature ATTAINAMENT	Date 6 30 18
Name (Print) Xut Taukul	, ,
City & State Houston, TX	

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Signature WWW VIII	Date (0.30 · 18 *
Name (Print) WWW VLDD	Allege Age
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# A Thorough Environmental Justice (EJ) Analysis Must Be Included In The EIS

Sincerely,	Alex		
Signature	(m/1)	Date	0/30/18
Name (Print)	Angelo Montoya	-	
City & State_	Santa Fe, MM	Y	

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

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Signature Like MC	Date _	10(30/18
( )		
Name (Print) Frika Martner		<b>-</b>
City & State Son & Fe, NM		<u> </u>

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Signature (MAFAL-Samb	Date (1/4 70, 2013)
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City & State ADA FEOM	······································

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Signature	Teges Excess Date 30 five (8	_
	San Dana	
Name (Print)	STEDHED KADA	
City & State	Soute Fe, NM 8750	

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Signature Shoshn toll	Date $\frac{6/30//3}{}$
Name (Print) Shoshanna Bettercourt	,
City & State Santa Fe, NM	

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Sincerely,		.			
Signature	Date _	0	30	18	
Name (Print) Patrick Harvey					
City & State Houston, TX		¬			

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Sincerely,	
Signature Sanden John	Date 6-30-/8
Name (Print) SANDRA TOBAR	
City & State Santa Te NM	

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

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Signature	ChUp	Date	6/30/10	
Name (Print)	Ninathombly	au by.	t l	
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Sincerely,	-PM1/2 -		(2/30/18
Signature	J-100h	Date	0 11 10
Name (Print)	Lynsey Rubin		·
City & State	S'unte te, MM	*	

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Sincerely,	
Signature by Brull	Date <u>6/30//8</u>
Name (Print) EtBA SPRUIL	
City & State SAN FRANCISCO, CA	94124

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Sincerely,		1			22.15
Signature	Comb			_ Date	4.90.10
Name (Print)	Andrea	<u> 5</u>	uXa_		
City & State_	Dakta	10	CA		

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Signature 1 m	Date 9/30/2018
Name (Print) JUNE WONG U	
City & State Bercelow CA	

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Sincerely,		1/20/10
Signature I muel Winter	_ Date _	6/10/10
Name (Print) Daniel Wenstand		-
City & State RIO RANCHO M		٦.

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Sincerely,	( / ~ / ) ()
Signature	Date
Name (Print) KOVINA WENT	TW0
City & State RIU RANCHO, NY	<u> </u>

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

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Signature Man Werland Date 6/30/18
Signature Mun Member Date 6/30/18
Name (Print) Lisa J Wentland
City & State Rio Rancho NM

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Sincerely,	( )
Signature Volume Volume	Date $\frac{\sqrt{30/8}}{}$
Name (Print) Judy Lee Walter	
City & State Santa Fe NM 87508	

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Signature Leonard Havera	Date <u>[                                   </u>
Name (Print) LEON/+R13 GARCIA	- Annual Control of the Control of t
City & State Santa Fe um.	*

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Signature doublet	Date
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City & State Edmond 6K	

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Signature \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\	Date <u>(-25-18</u>
Name (Print) Ward Diece	
City & State OXC, OX	

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Name (Print) _	Sarces	<u> </u>	inge!	ALL AND 11 1111 1 2	
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Name (Print) Doug J. Schitc	Administra
City & State Spulp To Q. A.	

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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.

#### 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

- 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

Sincerely,		
Signature / oren, Ochel	Date	6-30-18
	-	
Name (Print) AREN GIPEL		
City & State SF Un(		

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

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Sincerely,	/ /
Signature //	Date 6/30/18
Name (Print) 6/1/2 Robinson	
City & State Denvo/CO	

