## Holtec-CISFEISCEm Resource

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Sent:	Tuesday, July 31, 2018 1:10 AM
То:	Holtec-CISFEIS Resource
Subject:	[External_Sender] Comments on Proposed Holtec Project
Attachments:	Robert Oppenheimer NRC.doc

The attached letter describes why I do not consent to the Holtec high level nuclear waste storage facility near Carlsbad, NM.

Linda Sager Squire, DVM

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As if to acknowledge that the thick shroud of secrecy that preceded the first nuclear explosion was wrong, nuclear physicist Robert Oppenheimer is quoted as saying, "We do not believe any group of men adequate enough or wise enough to operate without scrutiny or without criticism. We know that the only way to avoid error is to detect it, that the only way to detect it is to be free to enquire. We know that in secrecy error, undetected, will flourish and subvert."

Oppenheimer may have been referring to the Department of Defense and the Atomic Energy Commission, government agencies that for way too many years avoided and escaped public scrutiny and Congressional oversight. The government would, for the next seventy years, keep the public more or less in the dark about the true nature of the hazardous effects of exposure to radioactive materials and the inherent dangers in mining, processing, fabricating, storing and exploding them. The secrets were easy to keep.

There may be decades and generations between radiation exposures and the appearance of symptoms. Radioactive hazards cannot be detected by any of the five senses and understanding the physics behind the decay chain of radioactive elements is way beyond the grasp of the average citizen. How powerful, energy-packed elements can contaminate air, water, soil, food, shelter and bodies is indeed a very complicated subject.

Sparsely populated New Mexico has one of the lowest high school graduation rates, ranking 46th out of 50 in percentage of population with high school diplomas. Our state falls near the bottom of the list in an overall ranking of public school systems and 50<sup>th</sup> in a US News "Best States for Education" summary. Obviously New Mexico residents are probably among the least prepared to be able to understand nuclear physics and the threats to their environment posed by a high level nuclear waste storage facility. Very few New Mexicans would be able to intelligently discuss or critique engineering and technical aspects of the proposed facility and costs of hiring expert witnesses would be prohibitive for almost all of us.

The average citizen of southeastern New Mexico has probably never read a non-biased history book. They would not even know about the many contaminated sites in our country and the haphazard engineering and lack of planning that created these messes in the first place. The Hanford site in Washington, Rocky Flats in Colorado, Idaho National Laboratories, Fernald in Ohio, Oak Ridge in Tennessee, Pantex in Texas, and the Savannah River site in South Carolina are just a few glaring examples of what can go wrong when government fails to provide reasonable oversight and management of dangerous materials and then chooses to ignore and minimize or bury safety problems and health issues away from public scrutiny.

The proponents of the Holtec project are hoping that local people, many of whom could not even begin to define the terms "radioactivity," or "half-life," can be convinced that it is a good idea to import hazardous high level nuclear waste into a dry, dusty, geologically unstable area for storage. Baby boomers, who were the human guinea pigs of the nuclear testing era, have recently been speaking publicly at NRC meetings about their fears of accidental exposures to radiation that could result from the Holtec Project. Instead of being treated with respect, they have met with ridicule from nuclear engineering students, young, inexperienced and educated just enough to be arrogant towards the public they will one day "serve." In editorials and newspaper articles, critics of the Holtec project have been discredited and opposing statements have been branded as "off-base" and "outrageous."

All human beings have natural fears and these reactions serve to protect us and our children from harm. Experience teaches us to be fearful of those who would have us believe that just because something is highly regulated by a huge government agency it is "safe." History tells us that fears of radiation exposure are justified and that we should have a healthy respect for the potential harm that can be inflicted. Acceptable exposure rates have been reset to lower levels many times over the years.

Half of any amount of entombed uranium would still be around in 4.5 billion years and the half life of least one of the plutonium isotopes is over 300,000 years. Safety strategies and fail-safe mechanisms to cover these immense time spans do not currently exist. Further down the decay chains, numerous daughter elements and isotopes have much shorter half lives with the potential to emit even more particles, heat and energy in shorter time spans. Exposure of the human body to short lived radionuclides could result in significant levels of tissue damage within the time frame of an average lifespan. Application of outside energy sources such as x-rays could accelerate the process even more.

Farmers, ranchers and dairy producers of this area certainly have good reason to be fearful, as many livelihoods are at stake and one serious accident could threaten all food producers in this area. The practice of moving radioactive materials out of contaminated places in an effort to "dilute" the problem has the potential to make more contaminated ruined places and more contaminated people, animals, farmland and water sources.

The NRC must focus on dealing with this huge problem in every place that it now exists, on site. We cannot afford to make more hazardous places.

Just as the mysteries of nuclear fission were unlocked in Los Alamos many decades ago, reasonable solutions and strategies for dealing with nuclear waste will most certainly become clear in the future. A reasonable solution is out there. Make finding it your mission, not again imposing more risks and more hardships on New Mexico.

Linda Sager Squire, DVM