SUNSI Review Complete
Template = ADM-013
E-RIDS=ADM-03
ADD= Antoinette Walker-Smith, Jill Caverly (JSC1)

COMMENT (287)
PUBLICATION DATE: 3/30/2018
CITATION # 83 FR 13802

July 25, 2018

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

Attn: Nuclear Regulatory Commission

RE:: Docket ID NRC–2018–0052; Holtec International's HI–STORE CIS Facility for Spent Nuclear Fuel, Lea County, New Mexico

As a citizen of Jal, New Mexico and I respectfully reject the Holtec Environmental Report (ER) proposal 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 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 to line the pockets of Holtec International.

The Holtec project would lead to dangerous extensive transport of high-level radioactive waste that would travel through major US cities, over major aquifers and across Tribal and agricultural lands. Without routes that are designated, the public cannot adequately comment on the impacts of this massive project.

Here are a few concrete things I urge you to consider:

1. 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.

2. 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.

3. 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.

4. 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 also be analyzed.

5. 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.

6. 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.

7. 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.

8. 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.

9. Impacts of Future Railroads and Electric Lines Must Be Analyzed

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

10. 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.

11. 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 impacts many 3.0 – 4.0 fracking-induced earthquakes will have on the buried casks.

12. The impacts of global warming on climate in the region and the resulting impacts on casks and canisters, in relation to their ratings, must be considered.

It is also unclear to me exactly how the town of Jal or Lea County would benefit directly from this operation. The City of Jal government has written a resolution rejecting Holtec's proposal and I fully support this.

Thank you for your consideration,

Jacquelyn R Orr