

## Holtec-CISFEISCEm Resource

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**From:** Louise Lamphere <lamphere@unm.edu>  
**Sent:** Tuesday, July 31, 2018 2:47 AM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] NRC request for comments on Holtec Proposal for a Consolidated Interim Storage Facility for Spent Fuel in Southeastern New Mexico

To Whom It May Concern

As a resident of New Mexico, I want to strenuously object to the proposed Consolidated Interim Storage Facility for Spent Fuel in Southeastern New Mexico. I feel that this project is potentially dangerous for New Mexico and for the Nation at large. It will have a negative impact on the environment and the health and well-being of New Mexico communities.

I see no purpose in temporarily storing in one place the spent nuclear fuel from private nuclear facilities across the country. I believe that privately owned nuclear facilities have to responsibility for storing their own spent fuel, and they seem to be doing a perfectly good job of this. Keeping spent fuel in a number of different and spatially dispersed sites seem much more prudent than putting it all together, especially because this is high-level radioactive waste, much more radioactive than material from government sources.

Holec apparently would use newly created canisters that would make transportation safe. However, there are reports of leakage in at least one of these canisters. Given the fragility of our rail system (since the canisters are too heavy to be transported by truck), it seems very risky to send these canisters from the East Coast and Midwest all the way to SE New Mexico.

There are also questions about the site itself, very close to the WIPP site that experienced a leak in 2014 that necessitated a three-year shut down and indicated how difficult it is to maintain a repository that is accident free. Unlike the WIPP project that is located in a salt deposit (that has the possibility of sealing off the nuclear waste site), the Holtec site is in an area of mostly sandstone and limestone that is not sufficiently stable. There is sink hole near Carlsbad, close to the proposed site, and also hydraulic fracturing taking place nearby. All of this raises serious issues about the wisdom of moving a large amount of highly radioactive material for an indefinite amount of time, with no researched and approved plans for permanent location for this waste to another and final site.

Finally, I understand that Holtec proposes that the US government pay for the transportation of this spent fuel. Since the Nuclear Waste Policy Act of 1982 allows the DOE to transport waste only to a geologic repository (like WIPP) but not to a private storage site, the proposed plan is illegal or would necessitate a change in the law. As a taxpayer, I feel that this use of our tax dollars is unnecessary and a waste of our financial resources.

For all these reasons, I urge the NRC to reject the Holtec proposal and the Consolidated Interim Storage facility.

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