

## Holtec-CISFEISCEm Resource

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US Nuclear Regulatory Commission

RE: Docket ID NRC-2018-0052; Holtec International's HI-STORE CIS Facility for Spent Nuclear Fuel,

Lea County NM

NRC:

Greetings from Eunice New Mexico.

I respectfully submit these scoping comments on the Holtec environmental report 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 the risk of contamination of our land and or health of plants, wildlife and livestock. I do not consent to endangering present and future generations of people in Lea County, New Mexico. I formally request an extension on this comment period. It is burdensome on the public to respond to this 543 page technical document of which 25% is redacted and unavailable for review. That must change in. There are also overlaps on other comment periods for WIPP and Los Alamos.

I am a native and life long resident of NM. My grown daughters are life long residents of this great place we live. We live and work in Eunice, Hobbs, and Lovington NM. We are property owners, business owners, mothers, wives, equal partners in our relationships and we unequivocally reject Holtec and their dangerous plan to bring spent fuel, high level radioactive waste to New Mexico. We live within 35 miles of the site. We have family that travel back and forth for pleasure and business on the road adjacent to the site Holtec has selected.

I have been to most of the NRC meetings and some other community gatherings regarding this project. I have facilitated some of these events because there was no Holtec people around to give information. The fact sheets given out are based on information from Holtec and the NRC as well as some well researched subjects. People are glad to get some information about this subject. They were also happy to sign the petition against Holtec as well. Since then time has passed and quite a few "tiny bands" of people have passed resolutions in their community to oppose Holtec. They were people that did their own work and research and found Holtec lacking in information and integrity.

Locally, I have found most of my neighbors are somewhat anxious about this whole subject. See, Eunice is located about 5 miles west of the Urenco and Waste Control Specialists sites. Both facilities handle radioactive materials and are regulated in different ways. NM handles Urenco and TX regulates WCS.

There have been at least 2 grassfires this year that came very close to the Urenco and WCS complex. Several fire departments in NM and TX were dispatched and responded. It doesn't take a vivid imagination to see that fire and nuclear waste do not mix. This brings a certain flight or fight response from those people that are closest to the sites. It takes about 40 minutes for Andrews Fire Dept to

respond to WCS and about 25 minutes for Hobbs Fire Department to respond to fire at the Urenco, WCS area. I would like very complete and accurate information about all fire departments and their planned response actions and times should there be a grassfire or other type of fire at Holtec site.

How would fire be contained? What is used in a fire at a site like Holtec? What should nearby residents do if a fire is fought at the site? Should there be evacuations, how far away should they travel, what are the chances of returning to their homes? Will there be contamination? Will Holtec or DOE be in charge? How will DOE respond in case of fire at Holtec? Is there someone at DOE who knows how to handle an emergency at Holtec or any place in the nation that an accident whether it be a train crash, fire, human intervention? Has there been a fire at a spent fuel storage site before? What happened, where, how much did it cost to remediate?

I have spoken with many people in the past few months while gathering signatures and disseminating factsheets about Holtec. I believe the majority of those that had an opinion say this is incredible that any of our government leaders in NM would bring this toxic and cancerous waste to our home. Why are they so eager to abandon their constituents and their values to support this project? Early this year knowing that this application would be submitted and probably be approved for further review, some 30 bipartisan NM state representatives and senators submitted a letter to the NRC requesting a delay in order to get more information on this project as well as allowing more public participation time. Another letter from some 7 state representatives and senators is sent to you stating to disregard the majority and let application deadline go as planned. Those same people have everything to do with the ELEA organization that brought Holtec in to my state. Shame on them. Nevertheless, there was an extension to the comment period allowed but still not enough time. It is a sham and I feel that before the NRC spends too much time on the comments, perhaps the ELEA organization and its bookkeeping and record keeping should be evaluated to see if every aspect of this organization is legal and above reproach. Too many missing records and this organization had tried years ago to bring GNEP to this same site. What happened to GNEP? Is the goal of ELEA to bring nuclear waste reprocessing to NM at some point? Is the goal of ELEA to promote and bring in defense waste? Is the goal of ELEA aligned with the desire of Lea County and Eddy County residents?

The local people of Lea county are of predominately Hispanic heritage and other minorities. I feel as a Hispanic woman that the brown skinned people have more than done their share of carrying the burden of too many nuclear related projects in NM. Indigenous people of NM have been burdened with uranium mining, coal burning projects, fallout on the Tularosa Basin, Los Alamos and their bomb making and experiments, White Sands Missile Range and their missions, Church Rock and its toxic spill. I am fed up with being a toilet and sewer for all the radioactive experiments of the United States. We are now expected to patriotically accept the worst radioactive waste in the world in the middle of what some think is a remote area. There are hundreds if not thousands of oil field and potash workers in that area that has been selected for Holtec. They have lives and families to care for. They are not asking for this danger to come to their neighborhood. No, it is the politicians that want revenue for the future. Yet they sacrifice the lives of those that put them in office. Then there is the CEO Kris Singh who claims that a "tiny band" of people are stopping all this from happening. Yes; we are going to stop this. Public scoping is important because it is the gathering of information from the public. Yet whole cities and counties in NM and TX are opposing this project not just the "tiny band" of activists.

I have found a great lack of participation from the general public at the NRC meetings, and lack of information in Spanish that actually gives more detail and how the Spanish speaking public can participate. There is a real language barrier, a transient population and no real "grassroots" activity until recently. This is not a popular activity to get involved in when the government is involved, especially with the Hispanic population who presently fear many things government related due to the recent Trump immigration and deportation stance of even naturalized citizens, active and retired military members and even babies. It is a difficult time in America where we all have to watch out for one another as the government undergoes Trumpism.

New Mexicans have no time to "make a business deal" with Holtec a private entity. They cannot qualify their containers that have been found to be inadequate at San Onofre, CA. Although California would desire for NM or TX take those defective and inferior Holtec containers because they are afraid of the consequences of using nuclear power over the years, New Mexico will not. We did not benefit from nuclear power from California, we do not want their dangerous cast off toxic waste. The Holtec canisters there should be able to handle that waste until a repository is found.

In a recent meeting in Hobbs with NM Radioactive Waste and Hazardous Materials meeting we learned that the Chairman Jeff Steinborn had sent out letters to several agencies trying to get more information and to my dismay he had no responses. There were two rail engineers there that did answer important questions but alas, we learn that the railroads are in bad shape especially in NM. This is a big reality check. The rails are BAD. As many as possible along the rails should be consulted and advised what could come through their town.

The Holtec containers should be tested under real conditions since computer module and postulation just is not enough testing for this experimental project.

How will Holtec help our economy and create job stability with only 50-100 workers?

How will Holtec ensure that they will remain fiscally stable?

How will Holtec help communities?

I don't believe Holtec will be a corporate neighbor because the dangers supercede any benefit.

I oppose Holtec and the interim storage of nuclear waste.

Sincerely

Rose Gardner

Box 514

Eunice NM 88231

Alliance for Environmental Strategies

