## Holtec-CISFEISCEm Resource

**From:** Concerned Citizens for Nuclear Safety <ccns@nuclearactive.org>
**Sent:** Monday, July 30, 2018 9:22 PM
**To:** Holtec-CISFEIS Resource
**Subject:** [External_Sender] Docket ID NRC-1018-0052: Sheila Gershen
**Attachments:** Sheila Gershen Holtec 7-29-18.pdf

Office of Administration

Mail Stop: TWFN-7-A60M

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Re: Docket ID NRC-2018-0052: Proposed Holtec International HI-STORE Consolidated Interim Storage (CIS) Facility for Spent Nuclear Fuel, Lea County, New Mexico

Good evening Nuclear Regulatory Commission:

Please find attached the comments of Sheila Gershen, of Santa Fe, NM, about her concerns about the proposal to store ALL of the spent fuel rods from every commercial nuclear power reactor in the USA at the Eddy Lea Energy Alliance / Holtec Facility.

**Please confirm you have received this email.**

Sincerely,

Concerned Citizens for Nuclear Safety

P. O. Box 31147

Santa Fe, NM 87594-1147

**Federal Register Notice:** 83FR13802
**Comment Number:** 3489

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7/29/18, 2018

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

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

NRC:

I respectfully submit these scoping comments on the Holtec Environmental Report (ER) to bring up to 100,000 metric tons of spent fuel and additional reprocessing waste—high-level radioactive waste—from nuclear reactors around the country to southeastern New Mexico for consolidated interim storage (CIS). I am submitting the following comments because **I do not consent to New Mexico becoming a national radioactive waste dump.** I do not consent to transporting up to 10,000 shipments of highly radioactive waste through thousands of communities nationwide to New Mexico with possibly another 10,000 shipments later to some as yet unknown repository. The transportation phase alone is reckless and the communities along the transportation routes are not adequately prepared to respond to a radioactive accident of this potential magnitude.

Holtec's application is for up to 120 years with a high possibility of waste remaining for at least 300 years. By that time the fragile, thin-walled containers will mostly likely be too delicate to move leaving all the nation's high level waste in a permanent, shallow landfill. The only benefit to New Mexico appears to be about 55 long-term jobs.

A public process at least as robust as that for the Yucca Mountain facility must be undertaken as the transportation routes go through most congressional districts, many major metropolitan areas, large amounts of agricultural land and environmental justice communities. Public scoping meetings must be held along the transportation routes including in the more than 20 cities through which this waste will be shipped.

Geological and hydrological investigations at least as robust and comprehensive as those for the Waste Isolation Pilot Plant (WIPP) must be undertaken as the site is a complex geological area with earthquakes, many natural resources, and karst formations including massive sinkholes. Those investigations were many and took years. Even if WIPP is sited on an island of non-karst in the middle of one of the largest karst areas in the world, the likelihood that Holtec is also sited in such a so-called safe area is remote; much more needs to be known about the geology and hydrology of the Holtec site before we can be sure it is safe. The studies for Holtec more resemble studies for a local gas station than those for a site planning to store and possibly dispose the most-deadly wastes in the entire nuclear fuel cycle.

Because the site is in one of the most heavily developed oil and gas areas in the country, the effects of fracking on the site, including a possible increase in man-made earthquakes must also be extensively studied.

**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.
- There is no current repository and it could be hundreds of years before one is created. In fact, there might never be a site chosen for this waste outside of New Mexico. Though New Mexico was promised that high level waste would never come to WIPP, WIPP could become that repository and already has modifications requests underway to increase its size and to allow it to accept high level waste.

**The Impacts Of Permanent Indefinite Storage (De Facto Disposal) 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.

**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 be analyzed.

**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 the environment, 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.
- The ER is inadequate because it does not discuss the effects from normal facility transportation on communities and especially on communities of color.

**Economic Effects On Current New Mexico Industry And Agriculture Must Be Analyzed**

- Impacts of potential contamination on local dairy & pecan farms, tourism, cattle ranching and the oil and gas industries that employ more than 34,000 people must be analyzed.
- The total number of annual workers at the site could total as many as 135 when construction jobs are combined with the operating workforce. How many of the estimated 135 jobs will go to locals?
- Impacts of loss of income and property values from the *perception of contamination* even if it doesn't actually occur must also be analyzed. How many current jobs would be lost if no one wants to buy southeastern New Mexico cattle, dairy and agricultural products or our oil and gas because it's believed it *could* be contaminated?
- This analysis must be extended to current industries and agriculture along the transportation routes to see what effects an accident with and without a release would have on those local economies.

**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. The thin walled casks cannot be inspected nor can they be repaired if they are found to be leaking.
- The application assumes that both transportation and containment at the site for centuries to come will be perfect. This is unreasonable and irresponsible.

**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 or how a release from Holtec could affect WIPP.

**Impacts Of Future Railroads And Electric Lines Must Be Analyzed**

- The ER does not analyze future railroads and electric lines that will be needed, but that are not yet in place.

**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 many 3.0 – 4.0 fracking-induced earthquakes or a much larger earthquake will have on the buried casks. This is an area with a long history of fracking and unstable geology.

Sincerely,

Signed _____

Name (Print) Sheila Gershen, PO Box 292

City & State Santa Fe, NM 87504