Holtec-CISFEISCEm Resource

From: Isabel Gibson <isabel.m.gibson@gmail.com>
Sent: Friday, July 27, 2018 2:09 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Holtec Scoping Comments
Attachments: Pyle Holtec comments to NRC.docx

Isabel Gibson's Holtec Scoping comments
To: US Nuclear Regulatory Commission/May Ma, Office of Administration

7/27/18
Santa Fe, NM
87501

I agree with Sasha Pyle's comments about the proposed nuclear waste disposal. Please consider me a co-signer of her comments (attached below). Thank you for taking the time to consider our stance.

Regards,
Isabel Gibson

Federal Register Notice: 83FR13802
Comment Number: 3499

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Sasha Pyle Holtec Scoping Comments
To: US Nuclear Regulatory Commission/
May Ma, Office of Administration

Submitted on-line at:
Holtec-CISFEIS@nrc.gov

July 26, 2018

I am writing to insist that the Nuclear Regulatory Commission must deny licensing to the proposed Holtec facility in southern New Mexico. High-level nuclear waste, in the form of spent nuclear fuel rods (SNF), must not be transported to, nor stored within this facility for any time whatsoever, based on the innumerable failings of the Holtec Environmental Report (ER). The ER is intended and required to demonstrate feasibility and safety of this plan and this site, yet it clearly does not fulfill that mandate.

First and foremost, the absurdity of designating a facility as "interim storage" when there is no plan of any kind for permanent disposal of this enormous inventory of dangerous SNF immediately raises the appalling specter in the minds of New Mexicans, of this waste staying forever at a site that in no way meets the technical and environmental standards that responsible permanent disposal dictates.

Consider, please, that the vastly more expensive and complex Yucca Mountain Facility in Nevada failed to achieve certification after being expressly designed and built for permanent disposal of spent fuel rods. How can we even consider allowing a much simplified, inferior destination facility to receive SNF, with the very real possibility looming that no one will ever return to reclaim, remove and properly dispose of this waste elsewhere?

There is a long and sad history in New Mexico of half-finished, failed, inadequate attempts at environmental remediation of toxic messes resulting from uranium mining, precious metals mining, potash mining, fossil fuels extraction, nuclear weapons manufacturing, and more. Poisonous abandoned mines and tailings heaps pollute our land and

water, languishing for decades, while no corporation or governmental agency takes responsibility for their remediation. Los Alamos Laboratory lags scandalously far behind its cleanup requirements, while hexavalent chromium plumes threaten the aquifer and the Rio Grande. Decades-old leaked jet fuel at Kirtland Air Force Base now imperils the drinking water of Albuquerque.

It is unconscionable to expect New Mexicans to place their faith and trust in any corporation or governmental agency a century in the future, when we see first-hand how environmental catastrophes are handled in a state with large minority populations and little political clout.

The complete failure of this ER to address the health and environmental impacts of a "temporary" site becoming a de facto permanent repository is a glaring omission that completely undermines the value of the Report.

Additionally, it is illegal under current federal law for this high-level waste to be transported by the Department of Energy to any site, unless that site is a DOE-owned monitored retrievable storage facility, which Holtec is not and never will be. There is no legal mechanism in place for authorizing or funding transportation of SNF to a private, corporate storage facility.

Utility companies produced these spent fuel rods while earning a profit. The Holtec facility would likewise be undertaken for profit. Taxpayers pay and pay, while New Mexico residents pay with their health and safety; future inhabitants of the region, who have no opportunity to comment, may pay the highest price of all. This concept is neither moral, nor just, nor legal. Currently, utility companies, by law, are responsible for the temporary storage of spent fuel rods. Control would be ceded to the Department of Energy when a permanent repository achieves certification. The private for-profit Holtec proposal is a poorly thought out scheme that would permanently muddy the waters when profits, risks, responsibilities and costs are allocated.

Transportation of irradiated fuel rods from the entire nation to southeastern New Mexico is another wildly dangerous (perhaps impossible) proposition that in no way has been sufficiently analyzed in

this Report. Where are the possible impacts of terrorist intervention in the transportation process analyzed? Who would be responsible for preventing such attacks? Who would pay to update and improve the poorly maintained rail tracks that are proposed for transporting this enormous volume of highly radioactive waste? Actual routes are not made explicit in the ER. Exposure levels to individuals in the event of a transportation-related accident are not fully analyzed, as they are required by law to be in this ER. The double costs and risks entailed by removing and re-transporting this waste at a later date are nowhere delineated. All in all, the ER's complete failure to address transportation costs and dangers marks this document as hopelessly inadequate.

Recent geological findings of dramatic ground subsidence throughout the eastern end of the Permian Basin seem to have escaped the attention of the Report's authors. Decades of over-drilling have altered the underground structure of this entire geologic feature. Can the well-trampled western end of the Permian Basin be far behind? Dramatic sinkholes in the region have been widely reported in recent news. It is possible an overall large-scale subsidence event may be well underway and only lagging behind in verification or documentation. Why is there no analysis of the future performance of the proposed facility in light of these current events? Why is there no acknowledgment of potential seismic events, when the link between fracking/injection wells and 3.0 to 4.0 earthquakes has been undeniably demonstrated? As we know from decades of debate on the suitability of the WIPP (Waste Isolation Pilot Plant) site, supposedly "stable" and "undisturbed" strata do not remain that way when holes are being punched into the ground in all directions for resource extraction or facility construction itself. The patterns of groundwater movement and aquifer recharge have never been adequately characterized for this entire region, which continues to surprise geologists with previously undiscovered or shifting channels and potential escape pathways that could turn a "temporary" nuclear waste "storage" site into a permanent toxic blight area with uninhabitable radiation levels.

On another, related topic, a long-time associate of mine in nuclear safety work has recently uncovered evidence that hazardous materials (chemical, not radioactive) appear to be present in the high-level waste, including beryllium. This would indicate that Holtec would also be

obligated under the law to apply for a permit under RCRA, the Resource Conservation and Recovery Act, which governs storage and disposal of said hazardous chemicals. If ANY part of the HLW aimed at Holtec is mixed waste, then ALL of the waste is subject to regulation as mixed waste. The New Mexico Environment Department (NMED) needs to be involved in evaluating this, and all other similar, proposals for storage or permanent disposal of these dangerous mixed wastes.

In summary: the Holtec ER never comes close to adequately analyzing alternatives or potential impacts; the design of the facility is inherently deceptive, and flies in the face of commonly accepted standards for nuclear waste storage or disposal repositories; the whole project involves risky and unproven ideas for the transportation and handling of the waste; and the Environmental Report in its current form utterly fails to demonstrate any advantage that this plan has over the vastly preferable strategy of Hardened On-Site Storage (HOSS) techniques. It is incumbent on the NRC to deny licensing for this temporary illusion of a waste disposal solution, which likely would become a permanent environmental and health disaster for untold generations to come.

New Mexico is not the nation's toxic trashcan. We deserve better, and we are watching very closely. Continued abuse of this state can only be attributed to a pernicious pattern of environmental racism, the corrupt profit motive, and a failed regulatory apparatus which is flat-out unacceptable when the materials to be regulated pose such grave concerns for human (and other) life.

Holtec is nowhere near ready for licensing, and NRC is the agency that must now acknowledge that fact.

Thank you for your consideration.

Sasha Pyle
(30-year nuclear safety advocate with
Concerned Citizens for Nuclear Safety,
Nuclear Watch New Mexico,
and national coalition Alliance for Nuclear Accountability)
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