## Holtec-CISFEISCEm Resource

**From:** Thompson E. Potter, Jr. <tpotter@law.harvard.edu>
**Sent:** Friday, July 27, 2018 12:10 PM
**To:** Holtec-CISFEIS Resource
**Subject:** [External_Sender] COMMENT TO the NRC on Docket ID NRC–2018–0052: Holtec International's HI–STORE Consolidated Interim Storage Facility Project

Dear Nuclear Regulatory Commission Staff:

Reject Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste first because centralized or consolidated interim storage sites are NOT allowed under US federal laws to the extent the Department of Energy and US taxpayers are expected to own and transport the waste. It is an ILLEGAL DUMP.

Reject and do not rely on the Environmental Report done by Tetra Tech for Holtec. A FRAUDULENT, CROOKED CONTRACTOR should not be doing the environmental analysis. For 20 years Tetra Tech has been falsifying radiation monitoring data, deliberately spreading radioactive soil and waste to previously clean places on and offsite, using unqualified workers to supervise radioactive scanning and cleanup efforts and suppressing and firing whistleblowers at the Navy's huge Hunters Point nuclear site in San Francisco, which is being converted to high-end housing. This is according to the US Navy, EPA and California Health Department. Based on this track record, Tetra Tech cannot be trusted to assess environmental impacts of the proposed Holtec dump.

The Holtec site VIOLATES ENVIROMENTAL and ECONOMIC JUSTICE. The proposed area has valuable industries including pecan, cattle ranches, dairy, and other local farming interests that would be threatened by the site. Even some of the hazardous and extractive industries that are a big part of the economy oppose the dump. New Mexico "has suffered enough as a national sacrifice zone at the hands of the nuclear industry, including abandoned uranium mines, the Manhattan Project, Trinity Test, plutonium contamination in the rivers downstream from Los Alamos, uranium enrichment, and hosting the nation's transuranic waste at the Waste Isolation Pilot Plant. As one of the poorest states, and a majority minority state, New Mexico has experienced environmental racism for decades. People of Color continue to be disproportionately impacted by hazardous and toxic wastes." (Samia Assed, Chair of the New Mexico Poor People's Campaign; see: www.nonuclearwaste.org) NRC should assess the multiple stresses on New Mexicans and failures to compensate them over the history of the atomic age.

CASK DANGERS. None of today's certified waste containers are designed for real world transport conditions (temperatures, crash speeds, submersion in deep water) and have not been physically tested despite dump-promoter's misuse of 40 year-old crash-test videos on totally different casks. The storage containers cannot be monitored for potential cracks and leaks, inspected, repaired or replaced even though we know the waste will be dangerous longer than they will last. The technology is in the "future" according to NRC staff. Nuclear Regulatory Commission (NRC) should include evaluation of moving 10's of 1000's of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railroad tracks, roads and bridges…impacts from many thousands of shipments on infrastructure, on people, businesses, communities, resources all along the way

HOTTER HIGH LEVEL WASTE. NRC should include full evaluation of "high burn-up" fuel. It is a significant portion of the waste that would go to Holtec.

EMERGENCY RESPONSE. Assess and report on the reliability and capability of volunteer and distantly-located emergency response personnel upon which the site will rely. Include availability, training, equipping and notification of emergency responders all along the routes.

HARSH ENVIRONMENT. Consider, in more than a cursory dismissive way, the decades of high temperatures, salty dry climate, potential flash floods, lightning, burrowing animals, sand, blocked vents, wind, rain, fire on the casks and waste. Assume increased earthquake risks and other impacts from fracking (which is not prohibited) near and under the site!

CONSOLIDATED “INTERIM” STORAGE (CIS) COULD BECOME PERMANENT. NRC must analyze the consequences of the waste remaining indefinitely at the site…never moving to another location. Holtec proposes to “consolidate” up to 173,600 metric tons of high-level waste from all US nuclear power reactors to New Mexico, near the famous Carlsbad Caverns, to “temporarily” store for 40-120 years. (It could take 40+ years to move it there!) The waste would allegedly be moved again but if no permanent site is found or money to move it again never appears, it could stay forever, despite not being designed for permanent isolation.

REPROCESSING + PROLIFERATION DANGER. NRC, analyze the possibility of the waste being reprocessed at the site, since consolidating waste is the first step to dangerous reprocessing to extract plutonium, increasing nuclear weapons proliferation, massive water use and intense, irreversible environmental contamination. Reprocessing was proposed at this same site before and must be addressed in the EIS.

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