

## Holtec-CISFEISCEm Resource

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**From:** Ned Flaherty <Ned\_Flaherty@msn.com>  
**Sent:** Friday, July 27, 2018 12:28 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 because it's unlawful for DoE and U.S. taxpayers to own and transport the waste.

Reject the Holtec Environmental Report authored by Tetra Tech, a known fraudulent contractor that is disqualified from any environmental analysis after U.S. Navy, EPA, and California Health Department proved decades of: falsified data, discarded radioactive soil / waste, use of unqualified workers in radioactive scanning / cleanup efforts, and suppressing and firing whistleblowers at the Navy's Hunters Point nuclear site in San Francisco.

The Holtec site VIOLATES ENVIROMENTAL and ECONOMIC JUSTICE. Holtec threatens valuable industries (pecan, cattle, dairy, etc.).

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; [www.nonuclearwaste.org](http://www.nonuclearwaste.org)

CASK DANGERS. None of today's certified waste containers are designed for real world transport conditions (temperatures, crash speeds, submersion in deep water) and none have been physically tested. It is impossible for the storage containers to be monitored, inspected, repaired, or replaced, even though the waste will remain dangerous beyond their lifetimes.

NRC (Nuclear Regulatory Commission) must evaluate moving 10's of 1000's of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railways, roads, and bridges, and the resulting impacts upon infrastructure, people, businesses, communities, and natural resources.

HOTTER HIGH LEVEL WASTE. NRC should include full evaluation of "high burn-up" fuel because it comprises a major portion of the Holtec waste.

EMERGENCY RESPONSE. Assess and report on the reliability and capability of volunteer and distantly-located emergency response personnel: availability, training, equipping, notification to responders.

HARSH ENVIRONMENT. Comprehensively assess the decades of high temperatures, salty dry climate, potential flash floods, lightning, burrowing animals, sand, blocked vents, wind, rain, and fire on the casks and waste, especially fracking-caused increased earthquake risks near and under the site.

CONSOLIDATED "INTERIM" STORAGE (CIS) COULD BECOME PERMANENT. NRC must itemize the consequences of waste remaining indefinitely at the site. Holtec proposes taking over 40 years to "consolidate" up to 173,600 metric tons of high-level waste from all U.S. nuclear power reactors to New Mexico, near the famous Carlsbad Caverns, to "temporarily" store for 40-120 years. With no permanent site, and no transport funding available, the waste would stay forever in a facility incapable of holding it.

REPROCESSING + PROLIFERATION DANGER. NRC's EIS must assess the risk of waste reprocessing on-site, plutonium extraction, weapons proliferation, massive water use, and intense, irreversible, environmental contamination.

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