

## Holtec-CISFEISCEM Resource

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**From:** Nancy Macy <nbbm@cruzio.com>  
**Sent:** Friday, July 27, 2018 1:07 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:

I strongly feel that you must 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. And there is no telling how long the "interim" period will last! That is absurd.

You should not trust Tetra Tech. I feel it is vital to reject and to 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 ENVIRONMENTAL 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](http://www.nonuclearwaste.org)) NRC should assess the multiple stresses on New Mexicans and failures to compensate them over the history of the atomic age. Environmental Justice calls for your action against this proposal.

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 could possibly last. The technology is in the "future" according to NRC staff.

The 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. There are enough rail ACCIDENTS alone to stop this venture, no less the possibility of TERRORISM! There is virtually no way to protect our communities from this prospect.

HOTTER HIGH-LEVEL WASTE is even more of a problem. NRC should undertake a full evaluation of “high burn-up” fuel. It is a significant portion of the waste that would go to Holtec. This is irresponsible and frightening.

Can the EMERGENCY RESPONSE be adequate? The site is remote, so there must be an assessment and report on the reliability and capability of volunteer and distantly-located emergency response personnel upon which the site will rely. This includes availability, training, equipping and notification of emergency responders all along the routes.

HARSH ENVIRONMENT. You must consider, in more than a cursory dismissive way, the many decades of extreme high temperatures, salty dry climate, potential flash floods, lightning, burrowing animals, sand, blocked vents, wind, rain, fire on the casks and waste. This will only get worse with the increasing temperatures due to climate change. What about the inevitable 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 very well take 40+ years simply to move it there!) What if there is a recession or depression that undermines the capability of Holtec to continue maintaining the site? How can any for-profit company hope to be around for the decades or centuries required? 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 - and therefore being inadequate.

REPROCESSING + PROLIFERATION DANGER. NRC must 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. After decades of research and effort, this is still undoable.

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