

## Holtec-CISFEISCEM Resource

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**From:** KRISTIN SHRADER-FRECHETTE <KSHRADER@ND.EDU>  
**Sent:** Friday, July 27, 2018 1:28 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:

As a scientist who specializes in public-health impacts of ionizing radiation, I oppose Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste because it would subject the entire country to dangerous radioactive waste shipments that cannot be made safe. The waste should stay where it is.

Besides, centralized or consolidated interim storage sites are NOT allowed under US federal laws when the Department of Energy and US taxpayers are expected to own and transport the waste. The site violates the law.

Third, Tetra Tech's environmental analysis for Holtec is scientifically flawed. The US Navy, EPA and California Health Department all say that Tetra Tech also has been credibly accused of 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 Hunters Point nuclear site in San Francisco. Tetra Tech has no credible scientific and ethical basis for being trusted to assess environmental impacts of the New Mexico site.

Fourth, New Mexico "has suffered enough as a national sacrifice zone because 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 and has been disproportionately impacted by hazardous and toxic wastes.

Fifth, 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 industry misuse of 40 year-old crash-test videos on different casks. The storage containers cannot be monitored for potential cracks and leaks, inspected, repaired or replaced, although the waste will be lethal far longer than the casks will last. The Nuclear Regulatory Commission (NRC) should include evaluation of moving tens of thousands of shipments of the most deadly radioactive waste in inadequate containers over deteriorating railroad tracks, roads and bridges...causing negative impacts on millions of people across the US.

Sixth, the NRC should include full evaluation of "high burn-up" fuel. It is a significant portion of the waste that would go to New Mexico.

Seventh, the NRC should 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.

Eighth, the NRC should analyze in probabilistic and inductive detail, 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. It should also assess increased earthquake risks and other impacts from fracking .

Ninth, the NRC must analyze the consequences of the waste remaining indefinitely at the site, and 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, but it could take 40+ years to move the waste to New Mexico.z 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.

Tenth, the 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.

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