

## Holtec-CISFEISCEm Resource

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**From:** Robert and Joan Holt <capejoanholt@comcast.net>  
**Sent:** Friday, July 27, 2018 3:09 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:

It troubles me that you are considering an application from Holtec International for a CISF for high level nuclear waste in New Mexico.

1. Such interim storage facilities for high level radioactive waste are illegal under US laws. Only the US Dept. of Energy may own and transport high level nuclear waste.
2. The NRC should reject any Environmental Impact data from Tetra Tech. Tetra Tech has a long record of falsifying radiation data and dispersing radioactive soil to previously uncontaminated places. Furthermore, the US EPA, the US Navy, and the California Health Department have reported violations by Tetra Tech of safety measures at the Navy's Hunters Point nuclear site in San Francisco, slated for future housing, including the use of unqualified workers and the suppression of information from whistleblowers.
3. The Holtec site is unacceptable. Its use as a nuclear waste dump will jeopardize several surrounding local farming facilities, local industries that oppose the dump. Since the advent of the US nuclear weapons program and nuclear power plants, New Mexico has been forced to absorb the lion's share of nuclear contamination. It is unjust to permit more radioactive detritus to be dumped on residents of the State of New Mexico.
4. Extensive transportation of nuclear waste poses an unacceptable risk to all people and places along all potential routes. The storage casks are untested and unreliable. The NRC (or any other agency) is unable to guarantee the safety of populations and infrastructure through which transport might occur. Transport of the deadliest, longest-lived contaminants represents a threat to people and places unlike anything we have experienced before on our roads and rails. Nowhere has there been training and preparation for possible mishaps. What sacrifices en route are the NRC willing to accept?
5. Has the NRC investigated and taken into account the new conditions of climate change? We are already experiencing extreme storm conditions and related climate and environmental hazards--floods, wild fires, sink holes, mud slides, bridge collapses, earthquakes, some of these events accompanied by losses of power and communications.

The above is probably the tip of the iceberg of the intractable problem the nuclear age has visited on humanity.

I urge that you reject the Holtec application so as not to make matters worse.

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Holtec International's HI-STORE Consolidated Interim Storage Facility Project  
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