

July XX, 2018

The Honorable Kristine L. Svinicki
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Chairman Svinicki,

As you are aware, an application was submitted to the Nuclear Regulatory Commission (NRC) from Holtec International on March 30, 2017 with the intent to store 500 canisters holding approximately 8,680 metric tons of highly radioactive waste in the form of irradiated nuclear fuel, and, eventually, up to 173,600 metric tons on a centralized interim storage facility (CISF, also known as a monitored retrievable storage site) in Lea County, New Mexico. On March 30, 2018, the NRC published notice in the Federal Register of its intent to prepare an environmental impact statement (EIS) on the project, known as the HI-STORE CISF.

The NRC on May 11, 2018 announced an extension to the initial May 29, 2018 deadline for environmental scoping public comments, till July 30, 2018. In addition to the three public comment meetings held in southeastern New Mexico in late April and early May, NRC announced two additional meetings in northern New Mexico, held on May 21 and May 22, 2018.

NRC also conducted a single webinar/call-in public comment meeting on April 25, 2018. Although the meeting was held at the agency's Rockville, Maryland headquarters, almost the entire 70-person turnout took place remotely, by phone or webinar. Only a single member of the public made comments in person, almost certainly due to an inadequate public outreach effort by the agency.

As the NRC continues soliciting public comment on the scope of its environmental review of Holtec International's application for a license to construct and operate the HI-STORE CISF in Lea County, New Mexico, we urge the agency to carry out a more robust, open and transparent approach to public outreach in order to accommodate the many interested citizens across our vast country. Our offices are receiving requests from constituents for additional opportunities to attend public scoping meetings in locations other than those near the proposed Holtec site in New Mexico. This is especially the case in major transportation hub corridor communities, regarding the transportation risks of this proposal.

The management of nuclear waste – its storage, transport, and safe disposal – is a subject of very significant public interest in our congressional districts. The public health, safety, and long-term implications of this proposal are great, as the proposal involves storing highly radioactive waste on an interim, but indefinite, basis as long as America continues to lack a permanent repository for this material. But the proposal also involves transport of irradiated nuclear fuel to a CISF in southeast

New Mexico, and then on from there to a yet to be identified repository elsewhere, multiplying shipment numbers and duration, and accompanying risks.

We propose that the NRC consider scheduling at least as many public comment meetings as did the U.S. Department of Energy (DOE) at the environmental scoping phase of the Yucca Mountain, Nevada repository proposal two decades ago.

The DOE Final Environmental Impact Statement for the Yucca Mountain proposal (Feb. 2002) listed, at Volume 1, pages 1-23 to 1-24, the following 15 environmental scoping public meeting locations: Sacramento, California; Denver, Colorado; College Park, Georgia (near Atlanta); Boise, Idaho; Chicago, Illinois; Linthicum, Maryland (near Baltimore); Kansas City, Missouri; Caliente, Nevada; Las Vegas, Nevada; Pahrump, Nevada; Reno, Nevada; Tonopah, Nevada; Troy, New York (near Albany); Dallas, Texas; and Salt Lake City, Utah.

Given that Holtec's proposed CISF could store as much as 173,600 metric tons of irradiated nuclear fuel, it would be more than twice the size of the Yucca Mountain, Nevada repository (limited to 70,000 metric tons, only 63,000 metric tons of which would be commercial irradiated nuclear fuel). Thus, the transport impacts and risks associated with Holtec's CISF in New Mexico would also be two to three times as large as Yucca Mountain's.

Even with five public scoping meetings listed above in Nevada regarding Yucca, there were ten additional meetings held in transport corridor communities. Thus, in addition to the five New Mexico meetings held regarding Holtec's CISF, at least ten additional public comment environmental scoping meetings should be conducted by NRC in different regions of the country that would be impacted by this proposal.

We propose that NRC consider scheduling at least ten additional public sessions regarding Holtec's CISF environmental scoping, to ensure that residents of impacted states and districts like ours have easier access to NRC officials in order to provide comment that could shape the environmental impact statement. Improved communication is necessary to ensure communities understand and trust the decision making process, and to ensure the NRC accounts for the wide variety of concerns of constituents in our districts.

The National Environmental Policy Act (NEPA) process provides for several opportunities for public comments from potentially affected and interested parties. As NRC continues the NEPA process, we strongly urge you to engage proactively with stakeholders, such as state and local officials, community members, and tribal governments to identify, avoid, or mitigate any environmental, cultural, or community impacts of this proposed project.

Sincerely,

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