

Holtec-CISFEISCEm Resource

From: Joni Arends <jarends@nuclearactive.org>
Sent: Monday, July 30, 2018 10:36 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Docket ID NRC-2018-0052: CCNS AND OUR MEMBERS DO NOT CONSENT

CONCERNED CITIZENS FOR NUCLEAR SAFETY

P.O. Box 31147

Santa Fe, NM 87594-1147

(505) 986-1973

nuclearactive.org

July 30, 2018

Ms. May Ma

Office of Administration

Mail Stop: TWFN-7- A60M

U.S. Nuclear Regulatory Commission

Washington, DC 20555- 0001

Re: Docket ID NRC-2018-0052 – CCNS DOES NOT CONSENT TO Holtec International’s HI-STORE Consolidated Interim Storage (CIS) Facility for Spent Nuclear Fuel and Reprocessing Waste, Lea County, New Mexico

Dear Ms. Ma:

Please accept these scoping comments of Concerned Citizens for Nuclear Safety (CCNS), a Santa Fe, New Mexico based non-governmental organization. CCNS formed in 1988 to address community concerns about the proposed transportation of plutonium-contaminated waste from Los Alamos National Laboratory to the then proposed Waste Isolation Pilot Plant (WIPP) through the center of Santa Fe, on St. Francis Drive. Our mission is *to protect all living beings and the environment from the effects of radioactive and other hazardous materials now and in the future.*

CCNS respectfully submits these scoping comments about the Holtec Environmental Report (ER) to bring up to 100,000 metric tons of spent fuel and additional reprocessing waste—high-level radioactive waste—from nuclear reactors around the country to southeastern New Mexico for consolidated interim storage (CIS). CCNS is submitting the following comments because **CCNS and our members do not consent to New Mexico becoming a national radioactive waste dump.**

CCNS and our members **do not consent** to transporting up to 10,000 shipments of highly radioactive waste through thousands of communities nationwide to New Mexico with possibly another 10,000 shipments, at some point in the future, to some as yet unknown repository. The transportation phase alone is irresponsible and reckless. It is well known that the communities along the transportation routes are not adequately prepared to respond to the potential magnitude of a radioactive and hazardous materials accident involving this highly radioactive waste.

Holtec's application is for a license for up to 120 years with a high possibility of waste remaining for at least 300 years. By that time the fragile, thin-walled containers will mostly likely be too delicate to move - leaving all the nation's high level waste in an illegal, permanent, shallow landfill. The only benefit to New Mexico appears to be about 55 long-term jobs.

A Nuclear Regulatory Commission (NRC) public process for the proposed Holtec CIS Facility must at least as robust as that for the Yucca Mountain facility. This has not been done. There has been a dearth of public meetings along the transportation routes. The transportation routes travel through most congressional districts, many major metropolitan areas, large swaths of agricultural land, and environmental justice, economic justice, and working family communities. Public scoping meetings must be held along the transportation routes, including in the more than 20 cities through which this waste will be shipped.

Geological and hydrological investigations at least as robust and comprehensive as those for the WIPP must be required by the NRC as the site is a complex geological area with earthquakes, many natural resources, and karst formations, including massive sinkholes. Those scientific investigations were many and took years. Even if WIPP is sited on an island of non-karst in the middle of one of the largest karst areas in the world, the likelihood that Holtec is also sited in such a so-called safe area is remote. Much more investigation and study must be done to fully understand the geology and hydrology of the Holtec site before the NRC may move forward with the license application. The studies found in Holtec's application more resemble studies for a local gas station than those for a site proposed to store, and possibly dispose of the most-deadly wastes in the entire nuclear fuel cycle.

Because the site is in one of the most heavily developed oil and gas areas in the country, the effects of fracking on the site, including a possible increase in man-made earthquakes must also be extensively studied. CCNS cites the following blog in support of this comment:
<http://blog.smu.edu/research/2018/03/20/radar-images-show-large-swath-of-texas-oil-patch-is-heaving-and-sinking-at-alarming-rates/>

The Holtec Proposal Is Contrary to Current Law

- Current law only allows the U.S. Department of Energy to take title to commercial spent fuel "following commencement of operation of a repository" or at a DOE-owned and operated monitored retrievable storage facility. The Holtec site meets neither requirement, as it is a private facility.
- There is no current repository and it could be hundreds of years before one is created. In fact, there might never be a site chosen for this waste outside of New Mexico. The Department of Energy (DOE) and the New Mexico congressional delegation promised that high level waste would never come to WIPP. Nevertheless, it is foreseeable that WIPP could become that repository and already has permit modification requests underway to increase its size and to allow it to accept high level waste.

The ER is Inadequate: Impacts of Permanent Indefinite Storage (De Facto Disposal) Must Be Analyzed

- The Environmental Report (ER) is inadequate and incomplete because it does not analyze the impacts of the spent fuel being left at the proposed Holtec site indefinitely.

The ER is Inadequate: More Alternatives Must Be Analyzed

- Keeping the spent fuel casks in some form of Hardened On-Site Storage (HOSS) on the reactor sites must be analyzed.
- The alternative of consolidated storage being done at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) must be analyzed.

The ER is Inadequate: All Transportation Risks, including Inadequate Emergency Response Capabilities, Must Be Analyzed

- The ER must include all transportation routes and the potential impacts of accidents or terrorism incidents on the environment, public health and safety along all the routes. It is unconscionable that all of the transportation routes are not available now.
- The ER is inadequate and incomplete because it does not discuss how rail shipments from reactors without rail access would be accomplished and the risks and impacts of such shipments and possible shipment alternatives.
- The ER is inadequate and incomplete because it does not discuss how barge shipments from reactors would be accomplished and the risks and impacts of such shipments and possible shipment alternatives.
- The ER is inadequate because it does not discuss the effects from normal facility transportation on environmental and economic justice communities, and especially on communities of color.

The ER is Inadequate: Economic Effects on Current New Mexico Industry and Agriculture Must Be Analyzed

- Impacts of potential contamination on local dairy and pecan farms, tourism, cattle ranching, and the oil and gas industries that employ more than 34,000 people must be analyzed.
- The total number of annual workers at the site could total as many as 135 when construction jobs are combined with the operating workforce. Please describe how many of the estimated 135 jobs will go to locals – with proper training.
- Impacts of loss of income and property values from the *perception of contamination* even if it doesn't actually occur must also be analyzed.
- How many current jobs would be lost if no one wants to buy southeastern New Mexico cattle, dairy and agricultural products or our oil and gas because it's believed it *could* be contaminated? For example, the impacts on the local economy when the 1979 Three Mile Island accident and subsequent releases occurred and the consumer boycott of Hershey chocolates.
- This analysis must be extended to current industries and agriculture along the transportation routes to see what effects an accident with and without a release would have on those local economies, jobs, peoples of color, and the environment.

The ER is Inadequate: Cracked and Leaking Casks Must Be Addressed

- The ER does not analyze exactly how radioactive waste from a cracked and leaking canister would be handled, since there is no wet pool or hot cell at the site. The thin walled casks cannot be inspected nor can they be repaired if they are found to be leaking.
- The application assumes that both transportation and containment at the site for centuries to come will be perfect. This is unreasonable and irresponsible. For example, the February 14, 2014 explosions and releases at the WIPP site.

The ER is Inadequate: Additional Cumulative Impacts Must Be Analyzed

- The ER mentions WIPP but does not analyze the impacts of a radiologic release from WIPP on the proposed CIS site or how a release from Holtec could affect WIPP.

The ER is Inadequate: Impacts of Future Railroads and Electric Lines Must Be Analyzed

- The ER does not analyze future railroads and electric lines that will be needed, but that are not yet in place. What would be the impacts of future construction and maintenance of such railroad tracks and electrical lines?

The ER is Inadequate: Seismic Impacts on Stored Casks Must Be Stated

- Although the ER gives a statement on recent seismic activity in the area, there is no analysis of what many 3.0 – 4.0 fracking-induced earthquakes or a much larger earthquake will have on the buried casks. Southeast New Mexico and West Texas have a long history of fracking and unstable geology, which is becoming more unstable and dangerous.
<http://blog.smu.edu/research/2018/03/20/radar-images-show-large-swath-of-texas-oil-patch-is-heaving-and-sinking-at-alarming-rates/>

Thank you for your careful consideration of our comments. Please contact me with any questions or concerns about these comments.

Sincerely,

Joni Arends

Executive Director

Federal Register Notice: 83FR13802
Comment Number: 6511

Mail Envelope Properties (15d4ea88a896d7cd0e07018b15af6e8f)

Subject: [External_Sender] Docket ID NRC-2018-0052: CCNS AND OUR MEMBERS DO NOT CONSENT
Sent Date: 7/30/2018 10:35:37 PM
Received Date: 7/30/2018 10:35:49 PM
From: Joni Arends

Created By: jarends@nuclearactive.org

Recipients:

Post Office: nuclearactive.org

Files	Size	Date & Time
MESSAGE	9995	7/30/2018 10:35:49 PM

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received: