Holtec-CISFEISCEm Resource

From: Joan Robins <1robins@swcp.com>
Sent: Monday, July 30, 2018 10:45 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Scoping Comments re: NRC-2018-0052

To the NRC scoping reviewers,

As a participant in the May 22, 2018 Albuquerque Environmental Scoping Meeting for a Proposed Consolidated Interim Storage Facility (CISF) for Spent Nuclear Fuel, I was impressed by the degree of knowledge and concerns expressed at this meeting. Concerns predominated among the many speakers.

I understand it is the NRC's role to determine whether it is safe to build and operate a CISF at the proposed site and evaluate the environmental impacts of building and operating a CISF at same proposed site. These are outlined in NRC's mission to license and regulate non-military use of radioactive materials to protect public health and safety, promote the common defense and security, and protect the environment.

I do not believe these objectives can be met by bringing in an "interim" facility to an area of New Mexico and west Texas already crowded with radioactive facilities. This facility would be about 13 miles from WIPP whose safety was violated a few years ago by a simple mistake with cat litter. We have no reason to be confident that Holtec will be much safer. Although it claims it has had no accidents in the 35 years it has been operating interim facilities throughout the United States, 35 years is nothing compared to 10,000 years that the fuel rods remain dangerous to all life. These fuel rods are much more radioactive than the waste sent to WIPP. In order to transport the "spent" rods, the fuel rods are placed in pools of water to cool. After several years cooling, they are placed in casks which need to cool to 400 degrees C. Although the NRC estimates very low risk of cask failure for 20 years or more, it takes 20-30 years for casks to cool enough for transport. Cask cracking has been found after 10

years. So predictions of safety seem unduly certain. It is estimated that a long term solution would be an underground burial at a well-researched site, but it would take 60 years for high level waste to be cool enough to deposit there after removal from a reactor.

This situation is untenable given the nuclear football being passed around from place to place. The best option should be to decrease nuclear generated electricity til it can be stopped and the reactors closed down. If the waste is removed from where it is generated, it is much more dangerous to transport and human beings are not likely to consider the consequences if removed from sight, ie: out of our backyards. It is safest if left in casks near where it is produced and so far, no problems have arisen.

Among the environmental concerns are the high cancer rates in southeast New Mexico and the extreme poverty of the people in this county. Also economic consequences need to be explored. Who would want to come to this part of New Mexico if a leak was possible and what would this do to our farmers. What happens if Holtec goes bankrupt? What is the effect of fracking on the region? What happens to the water table and earthquakes common now to fracking areas? Since Holtec is a private company, it doesn't release a lot of information necessary for full analysis, nor is there any incentive for other companies to explore alternatives.

John Buchser, Water Issues Chair of the Rio Grande Chapter of the Sierra Club has written in the Albuquerque Journal (7/1/18) of the "numerous fatal procedural and structural flaws" in the CISF.

"Alkaline soils there are corrosive. Fencing the site will not protect the area from armor-piercing artillery launched by terrorists from either of the 2 roads surrounding the site. There will be no continuous monitoring program to detect leaks. There is no plan on how to deal with leaking canisters. The data on radiation exposure to workers is proprietary. Transport vibration could cause cracking of the fuel rods, after which they cannot be safely transported at all.

"The best transport is via rail at low speeds, but the railroads have not been contracted. The transportation casks have not been tested to failure: what about a head-on collision of 2 trains, or trains falling off a bridge?" [NM bridges are by and large below safety standards.]

It may be objectionable to consider a lot of what if's, but considering that we are talking of hundreds, no thousands of years, we must investigate all possibilities to prevent nuclear disaster.

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