

## Holtec-CISFEISCEm Resource

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**From:** B. Geary <bgearyread@gmail.com>  
**Sent:** Monday, July 30, 2018 11:42 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:

The NRC MUST reject Holtec International's application for a consolidated "Interim" Storage Facility (CISF) for high-level nuclear waste. THE PLAN IS ILLEGAL. Holtec only intends to operate the dump IF the Department of Energy and US taxpayers take over ownership of the waste and pay to transport it across the country. This arrangement is NOT allowed under US federal laws.

The Environmental report done by Tetra Tech for Holtec must be rejected. Tetra Tech is a FRAUDULENT, crooked contractor. It has been falsifying radiation monitoring data for 20 years. Tetra Tech has been deliberately spreading radioactive soil and waste to previously clean places. Tetra Tech has been suppressing and firing whistleblowers at the Navy's Hunters Point nuclear site in San Francisco. Obviously, this company considers fraudulent activity a routine way to operate.

It would be the GRAVEST INJUSTICE to impose this "interim" storage site on New Mexico, which has long been a national sacrifice zone for the nuclear industry. Let me count the ways: abandoned uranium mines, the Manhattan Project, Trinity Test, plutonium contamination in the rivers downstream from Los Alamos, uranium enrichment activity, AND the nation's transuranic waste site at WIPP. The proposed dump site has valuable industries such as pecan, cattle ranching, dairy and other local farming interests that would be threatened by the site.

The CASK DANGERS alone would suffice to cause the plan to be rejected. 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 dump-promoter's misuse of 40 year-old crash-test videos on totally different casks. The storage containers cannot be monitored for potential cracks and leaks, inspected, repaired or replaced even though we know the waste will be dangerous longer than the casks will last. The technology is in the "future" according to NRC staff. Nuclear Regulatory Commission (NRC) should include evaluation of moving 10's of 1000's of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railroad tracks, roads and bridges. Impacts from many thousands of shipments multiply the dangers to infrastructure, people, businesses, communities and resources all along the travel routes.

HOTTER HIGH LEVEL WASTE. NRC should include full evaluation of "high burn-up" fuel. It is a significant portion of the waste that would go to Holtec.

EMERGENCY RESPONSE should be fully evaluated. 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.

HARSH ENVIRONMENT. Consider, in more than a cursory dismissive way, the decades of high temperatures, salty dry climate, potential flash floods, lightning, burrowing animals, sand, blocked vents, wind, rain, fire on the casks and waste. Assume increased earthquake risks and other impacts from FRACKING (which is not prohibited) near and under the site!

CONSOLIDATED "INTERIM" STORAGE (CIS) COULD BECOME PERMANENT. NRC must analyze the consequences of the waste remaining indefinitely at the site and in fact 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. (It could take 40+ years to move it there!) The waste would allegedly be moved again. But if no permanent site is found, or if money to move it again never appears, it could stay forever, despite the site's not being designed for permanent isolation.

The possibility of REPROCESSING at the site --plus PROLIFERATION DANGERS-- must be addressed. NRC, you 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 considered in the EIS.

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