

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE COMMISSION

In the Matter of:)
)
Holtec International) Docket No. 72-1051
)
(HI-STORE Consolidated Interim Storage Facility)
)

In the Matter of:)
)
Interim Storage Partners) Docket No. 72-1050
)
(WCS Consolidated Interim Storage Facility))
)

DECLARATION

1. My name is Tommy E. Taylor and my business address is 6101 Holiday Hill Road, Midland, Texas 79707. I reside at 4100 Timberglen Circle, Midland, Texas 79707. My position with Fasken Management, LLC is Vice President. I am authorized by the business to execute this declaration on its behalf and on behalf of the Permian Basin Land, Royalty and Operators Organization (PBLRO) of which Fasken Land and Minerals (Fasken) is a member.
2. This declaration is in support of PBLRO's and Fasken's Motion to Dismiss the applications of ISP and Holtec for the construction and operation of consolidated interim spent fuel facility (CISF).
3. Fasken Land and Minerals, of which Fasken Management, LLC is its General Partner, is engaged in oil and gas extraction and production activities. The business owns and/or leases property directly related to oil and gas activities that is/are located approximately 2 (two) miles from the proposed Holtec CISF site. PBLRO is an association that formed in response to the CISF applications of Holtec and ISP. D.K. Boyd, a member of PBLRO and with whom I am personally familiar, owns property adjacent to the ISP site. I am also personally familiar with the other members of PBLRO and the nature of their oil and gas business activities in the Permian Basin area.
4. My understanding is that Holtec and ISP plan to establish a facility at their respective sites to store spent nuclear fuel from commercial reactors in the United States.
5. I understand that a radiation release from the Holtec facility and/or the ISP facility or during transportation of spent nuclear fuel through or near the Permian Basin may contaminate the areas in which Fasken and other members of PBLRO have oil and gas property interests and/or extraction and production facilities.

6. A radiological contamination event has the potential to interrupt or foreclose further oil and gas extraction/production activities thereby diminishing or eliminating the economic value of the oil and gas assets of the Fasken and other members of PBLRO .
7. I am concerned that radiological contamination also has potential human health effects that may cause death, radiation related ailments and/or genetic defects. This potential, in addition to the impacts on human mortality and morbidity rates, also has economic costs associated with medical care and treatment of radiation related conditions that affect Fasken and other members of PBLRO.
8. Additionally, because a permanent repository for final disposition of spent nuclear fuel is neither built nor licensed, I am concerned that any so-called "interim" facility will become a permanent facility for spent nuclear fuel. Neither the Holtec nor ISP facility is intended or constructed for permanent disposition of spent nuclear fuel. Because a so-called "interim" facility is presently inadequate to protect from radiological hazards caused by either intentional or unintentional conduct during the term of the proposed license, the applications provide no indication that in the future protection from radiological hazards will increase. As the CISFs receive more waste the over time the amount of radiation will increase thereby making the CISFs more hazardous. This means that the radiological hazards effectively increase over time.
9. In order to assure that the licensing decision in this matter adequately protects the interests of Fasken and other PBLRO members in an environment free from radiation hazards associated with CISFs and to protect the economic interests of the Fasken and PBLRO to which Fasken belongs, I am authorized to effect Fasken's efforts in support of PBLRO's participation in the above-captioned NRC docket.

Under penalty of perjury, the above is true and correct to the best of my knowledge and understanding.

Tommy E. Taylor
Declarant: Fasken Land and Minerals, Ltd.
By Fasken Management, LLC, its General Partner
Tommy E. Taylor, Vice President

9/14/18
Date