

Intervenor Declarants for Citizens Environmental Coalition, New York

Declaration of Thomas Ellis

I, Thomas Ellis, am the Declarant herein, and I hereby make the following statements under the penalty of perjury:

1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.

2) My residence address is 413 NORTH PINE AVENUE, ALBANY, NY 12203

3) I know that the Nuclear Regulatory Commission is considering granting a license to Holtec International for the construction and operation of a HI Store Consolidated Interim Storage Facility near Hobbs, New Mexico for the purpose of storing up to 173,600 tons of high level nuclear waste in the form of spent nuclear fuel (SNF) and greater-than-Class-C (GTCC) wastes for at least 100 years, and possibly for centuries. I also know that the proposal will require delivery over hundreds or thousands of miles of at least 10,000 shipments of SNF-filled casks and GTCC wastes to the Holtec facility, and that these very dangerous radioactive wastes will be transported by truck, barge and/or rail to Holtec. I further understand that the deliveries to Holtec will take place over 20 years and that most of the waste will come from nuclear plant fuel pool locations in the eastern United States.

4) At least 95% of the planned shipments to Holtec in New Mexico will be railroad deliveries. I have studied Department of Energy maps of rail and highway transportation routes, and note that rail trackage / highway transport route or barge shipment is within 10 miles of my home / place of business and that it will likely be used to transport several hundred, or more, cargoes of SNF and/or GTCC wastes to the Holtec facility.

5) I am concerned for my personal safety and that of others who live in my household from radiation exposure in the event of a serious transport accident, vandalism or a terrorist attack on a shipment. I believe that if there are airborne or waterborne emissions from a breached cask during transport that those in my household and I might be exposed to radiation and suffer health consequences and serious property damage. I disagree with the rosy projections of perfect transport predicted by Holtec International in its Environmental Report (ER) it has compiled on the proposal for the facility.

6) I have reviewed the ER and note that there is no planned public health impact assessment of the effects of 20 years of transports of SNF and GTCC waste and only a superficial analysis of the risks from unbreached casks in transport.

7) I note that in the ER, Holtec states that it will strictly follow a "return to sender" policy, where if a cask is delivered to their New Mexico facility with a radiation leakage problem, it will be returned to the point of origin. Thus actively-leaking casks will travel close to my home, place of employment and/or places where I seek recreation. I believe that the risks of a radiation accident will be increased during such shipments. The Holtec practice seems to me to be in violation of federal regulations and possibly even

amounts to a criminal act and an adverse risk that neither my family nor I should have to bear. However, the Environmental Report contains no analysis of the potential scenarios involving a breached cask and that there is no analysis in the ER that addresses the potential contamination of land, water and property resources or the threat to public health and the environment from such a practice.

8) I understand the casks, once set on rail cars, will be extremely heavy and concentrated loads on the tracks, and similarly will be unusually heavy loads on the specially-built truck trailers used to transport them on highways. I am concerned that scenarios not contemplated by Holtec in its ER could occur, such as a radioactive cask being so overweight that it derails and sits for days or longer in an area in which I live/work/recreate; or a truck trailer load bearing failure that requires transfer of the transport cask onto another trailer near me or others in my household.

9) The thought of being stuck in traffic at a rail crossing or on a parallel highway near a cask containing SNF or GTCC causes me concern for my health and safety and that of people and animals in my household. Multiple transports in the thousands suggests to me that there may be cumulative radiation effects on people, plants and property from even normal transports of SNF and GTCC wastes along the proposed rail and highway routes.

10) The U.S. federal government or private industry should not have the right to make transportation decisions that put at risk our public health and the environment with only spotty and incomplete investigation and analysis.

11) I hereby designate Citizens Environmental Coalition, a New York state based grassroots environmental betterment organization of which I am a member, to represent my interests in a petition to intervene against granting an NRC license to Holtec International for the HI Store Consolidated Interim Storage Facility. I request that Citizens Environmental Coalition be accorded standing to proceed on my behalf. My interests will not be adequately represented unless Citizens Environmental Coalition is allowed to participate as a full party in this proceeding on my behalf.

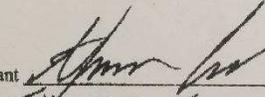
12) Further, Declarant saith naught.

Date

9/6/18

(Signature) Declarant

(Printed name)


THOMAS ELLIS

DECLARATION OF Linda DeStefano

I, Linda DeStefano, am the Declarant herein, and I hereby make the following statements under the penalty of perjury:

1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.

2) My residence address is 5031 Onondaga Rd. Syracuse, New York 13215-1403

3) I know that the Nuclear Regulatory Commission is considering granting a license to Holtec International for the construction and operation of a HI Store Consolidated Interim Storage Facility near Hobbs, New Mexico for the purpose of storing up to 173,600 tons of high level nuclear waste in the form of spent nuclear fuel (SNF) and greater-than-Class-C (GTCC) wastes for at least 100 years, and possibly for centuries. I also know that the proposal will require delivery over hundreds or thousands of miles of at least 10,000 shipments of SNF-filled casks and GTCC wastes to the Holtec facility, and that these very dangerous radioactive wastes will be transported by truck, barge and/or rail to Holtec. I further understand that the deliveries to Holtec will take place over 20 years and that most of the waste will come from nuclear plant fuel pool locations in the eastern United States.

4) At least 95% of the planned shipments to Holtec in New Mexico will be railroad deliveries. I have studied Department of Energy maps of rail and highway transportation routes, and note that rail trackage / highway transport route or barge shipment is within 5 to 10 miles of my home / place of business and that it will likely be used to transport several hundred, or more, cargoes of SNF and/or GTCC wastes to the Holtec facility.

5) I am concerned for my personal safety and that of others who live in my household from radiation exposure in the event of a serious transport accident, vandalism or a terrorist attack on a shipment. I believe that if there are airborne or waterborne emissions from a breached cask during transport that those in my household and I might be exposed to radiation and suffer health consequences and serious property damage. I disagree with the rosy projections of perfect transport predicted by Holtec International in its Environmental Report (ER) it has compiled on the proposal for the facility.

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12) Further, Declarant saith naught.

Date 9/5/18

(Signature) Declarant

Linda DeStefano

(Printed name) Linda DeStefano

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Linda DeStefano sent a declaration by email. She says that she and her husband travel on Amtrak several times a year and passenger and freight travels on the same rail. She expresses concern about exposure. Email communique from Linda DeStefano to Barbara Warren.

DECLARATION OF STANDING

I, Peter E. Swords, am the Declarant herein, and I hereby make the following statements under the penalty of perjury:

- 1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.
- 2) My residence address is 144 Kensington Place, Syracuse NY 13210 USA
- 3) I know that the Nuclear Regulatory Commission is considering granting a license to Holtec International for the construction and operation of a HI Store Consolidated Interim Storage Facility near Hobbs, New Mexico for the purpose of storing up to 173,600 tons of high level nuclear waste in the form of spent nuclear fuel (SNF) and greater-than-Class-C (GTCC) wastes for at least 100 years, and possibly for centuries. I also know that the proposal will require delivery over hundreds or thousands of miles of at least 10,000 shipments of SNF-filled casks and GTCC wastes to the Holtec facility, and that these very dangerous radioactive wastes will be transported by truck, barge and/or rail to Holtec. I further understand that the deliveries to Holtec will take place over 20 years and that most of the waste will come from nuclear plant fuel pool locations in the eastern United States.
- 4) At least 95% of the planned shipments to Holtec in New Mexico will be railroad deliveries. I have studied Department of Energy maps of rail and highway transportation routes, and note that rail trackage / highway transport route or barge shipment is within 2 miles of my home / place of business and that it will likely be used to transport several hundred, or more, cargoes of SNF and/or GTCC wastes to the Holtec facility.
- 5) I am concerned for my personal safety and that of others who live in my household from radiation exposure in the event of a serious transport accident, vandalism or a terrorist attack on a shipment. I believe that if there are airborne or waterborne emissions from a breached cask during transport that those in my household and I might be exposed to radiation and suffer health consequences and serious property damage. I disagree with the rosy projections of perfect transport predicted by Holtec International in its Environmental Report (ER) it has compiled on the proposal for the facility.
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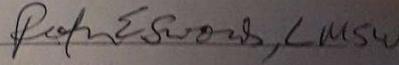
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12) Further, Declarant saith naught.

Date September 10, 2018

(Signature) Declarant



(Printed name) Peter E Swords, LMSW

DECLARATION OF Charles L. Bowman

I, Charles L. Bowman, am the Declarant herein, and I hereby make the following statements under the penalty of perjury:

1) I am an adult citizen of the United States, am not under disability, and make the

following statements voluntarily.

2) My residence address is 48 Sandelwood Dr, Getzville New York 14068

3) I know that the Nuclear Regulatory Commission is considering granting a license to Holtec International for the construction and operation of a HI Store Consolidated Interim Storage Facility near Hobbs, New Mexico for the purpose of storing up to 173,000 tons of high-level nuclear waste in the form of spent nuclear fuel (SNF) and greater-than-Class-C (GTCC) wastes for at least 100 years, and possibly for centuries. I also know that the proposal will require delivery over hundreds or thousands of miles of at least 10,000 shipments of SNF-filled casks and GTCC wastes to the Holtec facility, and that these very dangerous radioactive wastes will be transported by truck, barge and/or rail to Holtec. I further understand that the deliveries to Holtec will take place over 20 years and that most of the waste will come from nuclear plant fuel pool locations in the eastern United States.

4) At least 95% of the planned shipments to Holtec in New Mexico will be railroad deliveries. I have studied Department of Energy maps of rail and highway transportation routes, and note that rail trackage/highway transport route is within 8.2 miles of my (home/place of work/place of recreation) and that it will likely be used to transport several thousand, or more, cargoes of SNF and/or GTCC wastes to the Holtec facility.

5) I am concerned for my personal safety and that of others who live in my household from radiation exposure in the event of a serious transport accident, vandalism or a terrorist attack on a shipment. I believe that if there are airborne or waterborne emissions from a breached cask during transport that those in my household and I might be exposed to radiation and suffer health consequences and serious property damage. I disagree with the rosy projections of perfect transport predicted by Holtec International in its Environmental Report (ER) it has compiled on the proposal for the facility.

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loads on the tracks, and similarly will be unusually heavy loads on the specially-built truck trailers used to transport them on highways. I am concerned that scenarios not contemplated by Holtec in its ER could occur, such as a radioactive cask being so overweight that it derails and sits for days or longer in an area in which I live/work/recreate; or a truck trailer load bearing failure that requires transfer of the transport cask onto another trailer near me or others in my household.

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10) The U.S. federal government or private industry should not have the right to make transportation decisions that put at risk our public health and the environment with only spotty and incomplete investigation and analysis.

11) The driving distance between Oswego NY and Hobbs New Mexico is approximately 1,900 miles¹. The driving distance between Jacksonville Florida and Hobbs New Mexico is about 1,400 miles. I assume the rail lines are approximately the same distance from Hobbs New Mexico. New York State and Florida have nuclear power plants.

In New York State, most of the radioactive material will be traveling westbound along CSX owned class I tracks because there are nuclear power plants near Owego NY and Ontario NY. Spent nuclear fuel from Indian Point near Buchanan, New York, might also take CSX tracks in Upstate New York.

In New York State there were 38 rail accidents along CSX tracks in 2017². Each day roughly 38³ trains travel through the Amtrak Station in Depew NY, which is within 8.6 miles of my home in Getzville NY.

Therefore the likelihood of a rail accident along CSX tracks in NY State is 1 accident for every 365 trains traveling along CSX tracks, or 1 accident every 38⁴ days.

In 2014, the nationwide derailment rate was 1.63 derailments per million miles⁵.

There will be 10,000 shipments of spent nuclear fuel and greater than class C (GTCC) nuclear waste to Holtec International at Hobbs New Mexico, 95% by rail (i.e. 9,500 rail shipments) over 20 years.

Therefore, each year there will be an average of 475⁶ shipments by rail mostly most from the east coast (1400 to 1900 miles from Hobbs New Mexico, say, 1,500 miles by rail). The chance of a derailment for each rail shipment of spent nuclear fuel is approximately 1 in 409⁷.

¹ See google maps

² http://safetydata.fra.dot.gov/officeofsafety/publicsite/on_the_fly_download.aspx

³ 24 hour trainspotting effort, Depew NY Amtrak Station, between 6 PM July 22 and 6 PM July 23, 2018 done by volunteers from the Environmental Justice Task Force of the WNY Peace Center, Sierra Niagara Group, and Western New York Drilling Defense.

⁴ There are 38 trains per day x 365 days/year = 13,870 trains per year. There were 38 accidents along CSX tracks in NY State. 13780/38 = 365. Or one train accident every 365 trains traveling along CSX tracks.

⁵ Page 2. Freight-Train Derailment Rates for Railroad Safety and Risk Analysis

<https://www.efsec.wa.gov/Tesoro%20Savage/Adjudication/Exhibits/Tesoro%205B/Exhibit%200239-000021-TSS.pdf>

12) I am also concerned about the shipments of explosive Bakken crude oil from North Dakota being shipped along the same CSX tracks as the shipments of spent nuclear fuel. The tragic rail accident in Lac Megantic Quebec in July 2013 killed 47 people and destroyed much of downtown Lac Megantic. The first responders could not approach the burning tankers for 10 hours because of repeated BLEVES⁸. They had to stand by and let the tankers burn for 10 hours⁹.

If an accident happened with a train carrying spent nuclear fuel, will the first responders need to stand by while repeated BLEVES occurred, perhaps releasing radioactive material into the atmosphere?

Will such an accident evoke a criticality¹⁰ situation?

13) I hereby designate Citizens Environmental Coalition, a grassroots environmental betterment organization of which I am a member which is located at 422 Oakland Valley Rd, Cuddebackville NY 12729, to represent my interests in a petition intervene against granting an NRC license to Holtec International for the HI Store Consolidated Interim Storage Facility. I request that Citizens Environmental Campaign be accorded standing to proceed on behalf. My interests will not be adequately represented unless Citizens Environmental Campaign is allowed participate as a full party in this proceeding on my behalf.

12) Further, Declarant saith naught.

September 8, 2018

Charles L. Bowman

Date (Signature) Declarant



⁶ 9,500/20 = 475 shipments annually

⁷ 1.64 derailments per million miles x 1500 miles = 0.00245, or 1 derailment in 409 shipments.

⁸ BLEVES: Boiling liquid expanding vapor explosions.

⁹ In July 2016, I interviewed the fire chief of Lac Megantic: Denis Lauzon, TPI, Directeur, Securite Incendie for Lac Megantic, Quebec.

¹⁰ A self-sustaining nuclear chain reaction.

DECLARATION OF Joanne E. Hameister

I, Joanne E. Hameister, am the Declarant herein, and I hereby make the following statements under the penalty of perjury:

1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.

2) My residence address is 1051 Sweet Road, East Aurora, New York 14052

3) I know that the Nuclear Regulatory Commission is considering granting a license to Holtec International for the construction and operation of a HI Store Consolidated Interim Storage Facility near Hobbs, New Mexico for the purpose of storing up to 173,600 tons of high level nuclear waste in the form of spent nuclear fuel (SNF) and greater-than-Class-C (GTCC) wastes for at least 100 years, and possibly for centuries. I also know that the proposal will require delivery over hundreds or thousands of miles of at least 10,000 shipments of SNF-filled casks and GTCC wastes to the Holtec facility, and that these very dangerous radioactive wastes will be transported by truck, barge and/or rail to Holtec. I further understand that the deliveries to Holtec will take place over 20 years and that most of the waste will come from nuclear plant fuel pool locations in the eastern United States.

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12) Further, Declarant saith naught.

Date: Sept. 4, 2018

(Signature) Declarant



(Printed name)

Joanne E. Hameister

under the penalty of perjury:

- 1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.
- 2) My residence address is 601 W Ferry Street, Buffalo, NY US
- 3) I know that the Nuclear Regulatory Commission is considering granting a license to Holtec International for the construction and operation of a HI Store Consolidated Interim Storage Facility near Hobbs, New Mexico for the purpose of storing up to 173,600 tons of high level nuclear waste in the form of spent nuclear fuel (SNF) and greater-than-Class-C (GTCC) wastes for at least 100 years, and possibly for centuries. I also know that the proposal will require delivery over hundreds or thousands of miles of at least 10,000 shipments of SNF-filled casks and GTCC wastes to the Holtec facility, and that these very dangerous radioactive wastes will be transported by truck, barge and/or rail to Holtec. I further understand that the deliveries to Holtec will take place over 20 years and that most of the waste will come from nuclear plant fuel pool locations in the eastern United States.
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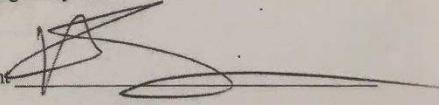
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12) Further, Declarant saith naught.

Date September 5, 2018

(Signature) Declarant 

(Printed name) Lynda H. Schneekloth