

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Before the Atomic Safety and Licensing Board**

In the Matter of) Docket No. 72-1051
Holtec International)
(HI-STORE Consolidated Interim Storage) September 14, 2018
Facility))
)

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MEMBER DECLARATION OF NUCLEAR ISSUES STUDY GROUP

DECLARATION OF LEONA MORGAN

I, Leona Morgan, 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 725 Tijeras Avenue Northwest, Albuquerque, NM 87102. I am self-employed as an independent contractor and work out of my home, so this is also my current place of employment.

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 1 mile 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 community 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 community 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. I note that 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 community. Multiple transports in the thousands suggest 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 Nuclear Issues Study Group (NISG), a grassroots environmental betterment organization of which I am a member which is located in Albuquerque, New Mexico (Mailing Address: 202 Harvard Dr SE, Albuquerque, NM 87106), 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 NISG be accorded standing to proceed on my behalf. My interests will not be adequately represented unless NISG is allowed to participate as a full party in this proceeding on my behalf.

12) Further, Declarant saith naught.

September 14, 2018
Date



(Signature) Declarant

Leona Morgan

(Printed name)