



## **DECLARATION OF Lucy Jane Swanson**

I, Lucy Jane Swanson, 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 475 Squire Canyon Road, San Luis Obispo, CA 93401

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 3 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.

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 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 San Luis Obispo Mothers for Peace, a grassroots environmental betterment organization of which I am a member which is located at P.O. Box 3608, San Luis Obispo CA 93403, 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 San Luis Obispo Mothers for Peace be accorded standing to proceed on my behalf. My interests will not be adequately represented unless San Luis Obispo Mothers for Peace is allowed to participate as a full party in this proceeding on my behalf.

12) Further, Declarant saith naught.

August 31, 2018  
Date

  
(Signature) Declarant

Lucy Jane Swanson  
(Printed name)



## DECLARATION OF JILL ZAMEK

I, Jill ZamEk, 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 1123 Flora Road, Arroyo Grande, CA 93420

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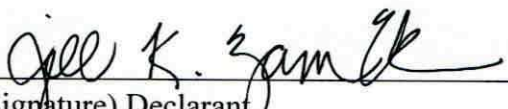
9) The thought of being stuck in traffic at a rail crossing or on a parallel highway near a cask containing SNF or GTCC causes me concern for my health and safety and that of people and animals in my household. Multiple transports in the thousands suggests to me that there may be cumulative radiation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

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12) Further, Declarant saith naught.

August 31, 2018  
Date

  
(Signature) Declarant

Jill K. ZamEk  
(Printed name)