

## CHAIRMAN Resource

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**From:** Robert Rutkowski <r\_e\_rutkowski@att.net>  
**Sent:** Thursday, September 27, 2018 2:12 PM  
**To:** CHAIRMAN Resource; WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] Comment on WCS/ ISP's Consolidated Interim Storage Facility/Docket ID NRC-2016-0231

Kristine Svinicki, Chairman  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
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Re: Comment on WCS/ ISP's Consolidated Interim Storage Facility/Docket ID NRC-2016-0231

Dear Chair:

The U.S. Nuclear Regulatory Commission's (NRC) decision to restart its review of a high-risk, high-level radioactive waste dump in West Texas creates an opportunity to halt a dangerous mistake.

Waste Control Specialists (WCS) is seeking to expand its existing low-level waste site to take high-level radioactive waste from nuclear power plants across the country. If the site is approved, 40,000 tons of spent fuel rods from nuclear reactors around the country would be transported to Texas and stored for 40 years or longer, risking the creation of an unsafe de facto permanent disposal facility. The waste likely would be shipped throughout the country on its way to the storage site.

The NRC put a hold on the application when WCS changed ownership. The clock is ticking for public input on the Texas proposal, which is important because public opposition has stopped the establishment of radioactive waste dumps in the past.

This plan is all risk and no reward – not only for Texas but for the whole country, and it should be halted immediately. People across the country should be concerned, because putting this waste on the nation's railways would invite disaster. The amount of radioactive waste on a single train car would contain as much plutonium as the bomb dropped on Nagasaki. Radioactive waste moving through highly populated cities across the country could be targeted for sabotage by terrorists or could cause catastrophe in the event of an accident.

The NRC will conduct safety and environmental reviews before it decides whether to approve the radioactive waste dump application, but the agency will not hold any public hearings, despite holding five hearings on a similar proposal this spring in New Mexico and two dozen for the Yucca Mountain site in Nevada. Texans are demanding public meetings; a public comment period is not enough to address these grave concerns.

Rather than store this radioactive waste on an exposed lot in West Texas, it should remain at the power plant where it was generated or nearby the plant until a scientifically viable isolation system for permanent disposal becomes available.

Supposedly "interim" or temporary high-level nuclear dumps are not even legal in the U.S. until there is a permanent site – and we don't have a permanent one. The government should not be threatening residents with these dumps and the dangerous unnecessary transport.

Recent experience has belied NRC claims that modeling shows no transportation risk. For example, in June 2016, two trains in Texas collided head-on at 65 mph, creating a huge fireball and resulting in two deaths.

Thank you for the opportunity to bring these remarks to your attention.

Yours sincerely,

Robert E. Rutkowski

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