## WCS_CISFEISCEm Resource

**From:** Craig Asbury <craigleenew@gmail.com>
**Sent:** Monday, October 1, 2018 12:02 PM
**To:** WCS_CISFEIS Resource
**Subject:** [External_Sender] NRC Docket 72-1050 NRC 2016-0231

Reject the Proposal to consolidate irradiated fuel because it is illegal, not allowed under federal law until there is a permanent repository operating. If NRC proceeds, the application should be published in Spanish so residents in the region can review it.

Please hold public meetings--none are now planned--Hold them communities and along all the potential routes especially in Texas. Extend the time for commenting 180 days.

Include in the Environmental Impact Statement scope, technical, social, geographic, cultural and political international impacts.

SYNERGISTIC EFFECTS --
WCS already has hazardous, radioactive and mixed waste and continues to bring in more to the site proposed for high level waste. There is a uranium enrichment facility next door. The EIS must evaluate the effects of multiple hazards and impacts of accidents, releases, explosions from its neighbors

EARTHQUAKES--
The area is potentially seismically active and there are large amounts of fracking and other extraction in proximity to the site, possibly even beneath the site!

SEVERE WEATHER and CLIMATIC CONDITIONS
The site of the proposed CIS facility in Andrews County, Texas is subject to severe weather and climatic conditions that could endanger nuclear waste containers. Extreme temperatures, wind and sand storms, wildfires, lightning strikes and storms, floods, and tornadoes can all impact the site.

PROXIMITY TO WATER--
WCS is seeking a permit to release radioactive and hazardous water to the New Mexico side of its property. There is water at the site and there are nearby major aquifer formations.

ACTS OF MALICE and OTHER DELIBERATE SABOTAGE en route to and at the proposed site must be considered, including potential drone attacks.

STORAGE CONTAINER SYSTEMS
The period of storage of irradiated fuel at WCS could exceed the expected life of the dry cask containers in which it is stored. NRC must consider the industry's present inability to re-containerize nuclear waste when casks fail, the absence of a facility at the proposed WCS site to perform such operations, and the amount and source of funds to pay for it.

ENVIROMENTAL and ECONOMIC JUSTICE--
The proposed area has valuable industries and interests that would be threatened by the site. Even some of the hazardous and extractive industries that are a big part of the economy oppose the dump. West Texans have

experienced environmental racism for decades. People of Color continue to be disproportionately impacted by hazardous and toxic wastes.

TRANSPORT DANGERS--
None of today's certified waste containers are designed for real world transport conditions (temperatures, crash speeds, submersion in water) and have not been physically tested despite dump-promoters' misuse of 40 year-old crash-test videos on totally different casks. The storage containers cannot be monitored for potential cracks and leaks, inspected, repaired or replaced even though we know the waste will be dangerous longer than they will last. The technology is in the "future" according to NRC staff. Tell the Nuclear Regulatory Commission (NRC) to prevent 10's of 1000's of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over the nation's railroad tracks, roads and bridges.

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