

# PUBLIC SUBMISSION

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Waste Control Specialists LLC's Consolidated Interim Spent Fuel Storage Facility Project

**Comment On:** NRC-2016-0231-0187

Interim Storage Partners LLC's Consolidated Interim Spent Fuel Storage Facility

**Document:** NRC-2016-0231-DRAFT-0228

Comment on FR Doc # 2018-19058

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## Submitter Information

**Name:** Christopher Lish

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## General Comment

See attached file(s)

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## Attachments

181018\_nrc-2016-0231-0187\_reject\_cisf\_proposal

Thursday, October 18, 2018

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Office of Administration  
Mail Stop: TWFN-7-A60M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Reject the WCS Nuclear Waste Dump and Prevent Decades of Massive Radioactive Shipments -- Interim Storage Partners LLC's Consolidated Interim Spent Fuel Storage Facility (Docket ID: NRC-2016-0231-0187)

To Nuclear Regulatory Commission Chairperson Kristine Svinicki,

I am very disturbed by the plan proposed by Interim Storage Partners (ISP) to build a massive “centralized interim storage” facility in Andrews County, Texas, to which take all of the commercial high level nuclear power waste in the US would be shipped. If licensed by the US Nuclear Regulatory Commission (NRC), over 100,000 tons of the hottest nuclear waste in the whole nuclear power and weapons fuel chain would move on our roads, rails, and waterways. It could take twenty to forty years to move the waste to these sites—but then it would all presumably be moved again to a different permanent site that has yet to be found. So this would appear to be the start of a virtually endless cycle of moving dangerously radioactive nuclear waste back and forth across the country. I strongly urge the NRC to reject this proposal.

As the NRC evaluates the possible environmental impacts of the proposed nuclear waste dump targeted for Andrews County, I urge the NRC to consider the following:

**1. The Proposed WCS Dump would be Illegal:**

The NRC must reject WCS (and all) applications for a Consolidated “Interim” Storage Facility (CISF) for high-level nuclear waste because such facilities are not allowed under US federal laws to the extent that the Department of Energy and US taxpayers are expected to own and transport the waste.

**2. The Proposal Violates Environmental and Economic Justice Principles:**

West Texans have experienced environmental racism for decades and people of color continue to be disproportionately impacted by hazardous and toxic wastes. The population that will be most impacted by the proposal is largely Latino. Many of these US Citizens speak Spanish as their first language, yet the NRC has not published any outreach materials about this proposal in Spanish. The NRC and the applicant needs to provide the application and other material relating to this proposal in Spanish. Although the economy can be boom and bust, those impacted are less able politically and economically to afford to challenge the proposed dump. The impacts on lower income residents and on people with lifestyles closer to the land is exponentially greater than on those that have more resources and connections to compensate or relocate.

The proposed area also 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 in the region oppose the dump. The Environmental Impact Statement (EIS) must look at the impact on the existing sustainable part of the economic engine in the communities and the region, including the potential impact of a severe transport accident and release.

**3. Transporting the Storage Containers is Dangerous:**

None of today's certified waste containers are designed for real world transport conditions (temperatures, crash speeds, submersion in deep water) and have not been physically tested despite dump-promoter's misuse of forty 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. The NRC should prevent thousands of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railroad tracks, roads and bridges.

**4. Risk of Intentional Attacks:**

Acts of malice and other deliberate sabotage en route to and at the proposed site must be considered, including potential drone attacks.

**5. Hazards of Hotter High Level Waste:**

The NRC should include full evaluation of storage and transport of "high burnup" fuel. It is a significant portion of the waste that would go to WCS.

**5. Inadequate Emergency Response:**

The NRC should include in the EIS the reliability and capability of volunteer and distantly-located emergency response personnel upon which the site will rely. Include availability, training, equipping and notification to emergency responders all along the way for radioactive accidents and attacks.

**6. Severe Weather and Harsh 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. The NRC must provide in depth analysis of the impacts on the waste and containers of high temperatures, salty dry climate, potential flash floods, lightning, burrowing animals, sand, blocked vents, wind, rain, fire on the casks and waste. The EIS should plan for Climate Change and unpredictable conditions.

**7. 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. Assume

increased earthquake risks and other impacts from fracking near the site and in the whole region.

**8. 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 that will be contaminated.

**9. 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, and/or explosions from its neighbors.

**10. Consolidated “Interim” Storage Could Become Permanent:**

WCS plans to consolidate 40,000 tons of high-level waste from nuclear power reactors in TX to “temporarily” store for forty to sixty to one hundred more years. The waste would allegedly move again, but if no permanent site is found or money to move it again never appears, it could stay forever, despite not being designed for permanent isolation. Transport is necessary for evaluating this facility and cannot be segmented out of the EIS.

**11. 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. The 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.

**12. Reprocessing and Proliferation Danger:**

Consolidating waste is the first step to dangerous reprocessing to extract plutonium, increasing nuclear weapons proliferation, massive water use, and intense, irreversible environmental contamination. Reprocessing was proposed at this same site before and must be addressed in the EIS.

Once again, I urge the NRC to reject the proposal to consolidate irradiated fuel.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA