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ADD= Antoinette Walker-Smith,  
James Park, Cinthya Cuevas  
Roman, Jenny Weil

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# PUBLIC SUBMISSION

COMMENT (56)  
PUBLICATION DATE: 9/4/2018  
CITATION 83 FR 44922

**Docket:** NRC-2016-0231

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-0235

Comment on FR Doc # 2018-19058

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## Submitter Information

**Name:** Jennifer Allmon

**Submitter's Representative:** Jennifer Allmon

**Organization:** Texas Catholic Conference of Bishops

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## General Comment

October 19, 2018

Cindy Bladey  
Office of Administration  
Mail Stop: OWFN-12-H08  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001

RE: Docket No. 72-1050; NRC-2016-0231 Waste Control Specialists LLC's Consolidated Interim Spent Fuel Storage Facility Project

Dear Cindy Bladey and the NRC,

We are writing to express our concern about the proposal to store high-level radioactive waste in Andrews County, Texas. The expedited schedule to grant a federal permit for a storage site for high-level radioactive waste in Andrews County would allow Waste Control Specialists (WCS) to bring in 40,000 tons of the most lethal of radioactive waste the spent fuel rods from nuclear reactors around the country. Their temporary license application anticipates storage for 60 years and allows them to seek extensions for even longer. While the site design is inadequate for permanent disposal, what is now billed as interim storage could easily become permanent by default.

For the sake of the common good, we ask that this permit not be granted. There are too many risks of leakage or accidents. The plan in Andrews County is for the exposed storage casks to be stored openly on the ground. The casks have been tested only by the manufacturer, not by any independent tester. Metal eventually fails. Concrete can develop cracks. Since each of the casks would contain as much radiation as the nuclear reactor accident at Chernobyl, we are concerned that an accident in Andrews County could cause irreparable harm to the public health and common good of West Texas and our neighbors in New Mexico.

This is an issue that will affect the lives of the unborn, young, old, and many future generations of West Texans.

Furthermore, the transportation of nuclear waste to this site presents serious risks throughout the country, concentrating in the state of Texas. If the NRC approves the requested license, more than 4,000 rail cars of deadly radioactive waste would move across the nation, with Texas as the ultimate destination, for many years, creating risks from accidents, leaks, and terrorist actions. In Texas, we experience train derailments frequently. With transport of these nuclear materials primarily by train, one radioactive railway accident in Texas could destroy lives and livelihoods for generations.

Transportation routes have yet to be announced, but radioactive uranium and plutonium will undoubtedly travel near waterways, across ranch and farmland, tribal lands, and through urban areas. Each rail car could carry as much plutonium as was in the bomb dropped on Nagasaki. The impact of a train derailment or other accident with these materials would be catastrophic.

We encourage you to consider the health, safety, and security impacts this initiative will have, and do not approve the permit for the proposed high-level spent fuel storage project in Andrews County, Texas.

Sincerely,

Jennifer Carr Allmon  
Executive Director

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## **Attachments**

TCCB Letter on Radioactive Waste 10-19-18



# Texas Catholic Conference of Bishops

THE PUBLIC POLICY VOICE OF THE CHURCH

October 19, 2018

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Jennifer Carr Allmon  
EXECUTIVE DIRECTOR

Cindy Bladey  
Office of Administration  
Mail Stop: OWFN-12-H08  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001

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Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Carr Allmon", with a long horizontal flourish extending to the right.

Jennifer Carr Allmon  
Executive Director

Cc: Most Rev. Michael J. Sis