

## WCS\_CISFEISCEm Resource

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**From:** Norda Gromoll <gromoll@nnex.net>  
**Sent:** Sunday, October 14, 2018 12:34 PM  
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**Subject:** [External\_Sender] nuclear waste transport: Docket ID NRC-2016-0231

This game of high-risk, high-level radioactive waste musical chairs, or hot potato, on the roads, rails, and waterways, is unacceptable. It amounts to Radioactive Russian roulette. Multiplying transport risks for no good reason is wrong, and makes no sense.

The Nuclear Assurance Corporation's Quality Assurance (NAC QA) failures mentioned above are very significant to shipping risks. Shipping casks would be less capable of withstanding severe accidents (such as high-speed crashes, including into immovable objects, like bridge abutments; high-temperature, long-duration fires; deep, long-lasting underwater submersions; drops from tall heights, onto unyielding surfaces, such as bridge foundations; or some combination of all those), as well as intentional attacks (such as with shaped charges, or anti-tank weapon systems – see below) or other powerful explosions (such as explosive cargoes on passing trains, including, nowadays, crude oil “Bomb Trains,” as from the Bakken oil fields in North Dakota).

Adding to these shipping risks, is the potential for barge shipments on surface waters. WCS is supposed to be “mostly rail” -- which can also mean many barges (26 reactors in the U.S. lack direct rail access, meaning barges on surface waters -- the Great Lakes, rivers, seacoasts -- could be used to haul the 100+ ton, rail-sized casks to the nearest rail head). Backgrounders (including more details on the high risks) on these various barge routes (including maps) were originally written for the Yucca dump scheme; however, WCS could just as well involve such barges.

Please do not do it.  
Norda Gromoll

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