

## WCS\_CISFEISCEm Resource

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**From:** Rita Beving <info@sg.actionnetwork.org>  
**Sent:** Monday, October 15, 2018 6:21 PM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] NRC-2016-0231; Docket # 72-1050

May Ma ,

RE: Waste Control Specialists LLC's / ISP's Consolidated Interim Spent Fuel Storage Facility Project

Dear NRC and May Ma,

I live in Farmers Branch, Texas - and I'm furious that you want to make Texas the dumping ground of the nation. I also resent the fact that you may be exposing my backyard and the DFW metroplex to rail cars of high level radioactive waste. God forbid if there would be an accident or a terrorist attack as this waste may travel through urban railyards besides our highways and freeways.

I have toured the WCS site in Andrews County. And I am not impressed by their facility - or its security. During the last 2017 legislative session, Texas lawmakers were so concerned about this company's financial viability that the House Committee elected to do a study re: this waste site.

This projects seeks to import up to 40,000 tons of spent fuel, high-level radioactive waste, from nuclear reactors around the country and store it on the existing site in Andrews County for 40 years or longer.

Human exposure to unshielded high-level radioactive waste can lead to immediate death. This dangerous waste can lead to cancers, genetic damage and birth defects.

Importing high-level radioactive waste would create risks to public health, safety and the state's financial well-being.

This project and a similar proposal by Holtec for nearby New Mexico should be halted immediately.

The WCS facility cannot legally operate, per the Nuclear Waste Policy Amendments Act of 1987, so the NRC shouldn't even be considering the license application. However, your agency is now pushing forward with new corporate ownership of WCS and a revised application.

Texans don't want dangerous high-level radioactive waste, but the NRC has not even heard the voices of thousands of concerned citizens. Why? They simply don't know about it. There has not been a single public meeting on the revised application here in DFW.

I am on the Local Emergency Planning Committee (LEGC), for Dallas County. I serve at the pleasure of the County Judge who oversees all emergency planning. We have not been briefed. So many counties, including Dallas, and some cities have devised and passed resolutions opposing the radioactive waste plans and transport. Those counties include Bexar, Nueces and Midland counties along with the City of San Antonio. Why hasn't the NRC held meetings in Dallas or any of these locations, even for the original application?

As I understand it, the NRC has held only one Texas meeting on the project, and that was ONLY in Andrews, hundreds of miles from major cities that would be impacted by rail transport of radioactive waste. By contrast, five NRC meetings were held in New Mexico regarding Holtec's proposal there and twenty-four meetings were held for Yucca Mountain, across the country. This proposal would result in the dangerous transport of radioactive waste across the country, but the public has been given almost no opportunity to learn about such a project with potential deadly and devastating consequences. How are local emergency responders to deal with an incident? What measures have been put in place to deal with such a catastrophic situation?

Please extend the intervention and public comment deadlines until at least 180 days after license application. All public notice and license application documents, scoping and intervention materials should also be made available in Spanish.

This extension is needed to allow for adequate public input. Please host public meetings in Dallas, Houston, San Antonio, El Paso, Midland and Andrews.

The WCS Environmental Report is INADEQUATE! And it should clearly identify transportation routes that would be used across the country.

A thorough report should examine the following:

- Impacts of external factors including temperature extremes, wildfires, flooding, earthquakes,

tornadoes, lightning, and shifting ground (as reported in recent Southern Methodist University studies) on radioactive waste casks and canisters.

- Groundwater risks including that of the the nearby Ogallala Aquifer, a major drinking water source, which provides water for agriculture, ranching and wildlife.
- Risks of dumping high-level radioactive waste on both a rural and largely Hispanic West Texas region.
- Necessary monitoring, security and worker protections. An emergency plan should include actions to be taken beyond just a notification structure. It appears that there are no viable plans for action should an emergency arise.
- Financial security, liability and the assurity of the new WCS owner should be examined. I understand this entity is an equity firm that buys and sells companies. How do we know this permit cannot be "flipped?" What guarantees does the NRC have to a long term commitment from the owner while they operate the site -- and after the site someday closes? One only needs to look to the shaky financial situation that WCS has already been in to justify those fears.

Again, transporting radioactive waste through Texas would risk my family's health and security. Such transport and storage could also lead to an environmental and financial disaster which would leave taxpayers to pick up the tab, while causing damage to existing businesses, and permanently contaminating land, air and water at the site and along transport routes.

This waste must remain stable and isolated for a million years. Storing it for decades above ground in extreme climate conditions does ensure this needed stability.

How can Texans be assured that this also doesn't become a permanent repository?

The NRC should halt review of the WCS license application for Consolidated Interim Storage in Texas, as well as review of the Holtec project proposed for nearby New Mexico. At this point, it is in the national interest of our public health and safety both licenses should be denied.

The public has a right to know and understand the implications of these deadly waste projects. At a minimum, there should be an extension of consideration and proper public meetings before this proceeds any further.

With dismay for the lack of consideration for our state and those who live here,  
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