

WCS_CISFEISCEm Resource

From: Kristen Bollinger <info@sg.actionnetwork.org>
Sent: Monday, October 15, 2018 11:43 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 Ladies and Gentlemen,

Waste Control Specialists ("WCS") and its partner seek to import up to 40,000 tons of spent fuel, which is high-level radioactive waste, from nuclear reactors around the country, and to store such waste on WCS's existing site in Andrews County, Texas for 40 years (or longer). This dangerous waste can lead to cancers, genetic damage and birth defects. Human exposure to unshielded high-level radioactive waste can lead to immediate death. Homeowners' insurance doesn't cover radioactive contamination. Importing high-level radioactive waste would create risks to public health, safety and financial wellbeing. This project and a similar proposal by Holtec for nearby New Mexico should be halted immediately. Waste would travel through major Texas cities to reach either site.

Under the Nuclear Waste Policy Amendments Act of 1987, the WCS facility cannot operate legally, so the NRC should not consider the license application. However, the NRC 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 heard the voices of many concerned Texans. There has not been a single public meeting on the revised application. Resolutions opposing the radioactive waste plans and transport were passed by Dallas, Bexar, Nueces and Midland counties and the City of San Antonio, yet NRC has failed to host meetings in any of these locations, even for the original application. The NRC has held only one Texas meeting on the project, and that was in Andrews County, hundreds of miles from major cities that would be affected by the rail transport of radioactive waste. By contrast, the NRC held five meetings 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 as much transport of radioactive waste across the country, but the public has not had an adequate opportunity to be heard on this issue.

Please extend intervention and public comment deadlines until at least 180 days after the license application and scoping and intervention materials are made available in Spanish. This extension is necessary to allow for adequate public input. Please host public meetings in Dallas, Houston, San Antonio, El Paso, Midland, and Andrews County and make all public notice and license application documents available in Spanish.

The inadequate WCS Environmental Report should clearly identify transportation routes that would be used across the country and thoroughly examine:

- Risks to groundwater and the nearby Ogallala Aquifer, which lies beneath eight states, providing drinking water, and water for agriculture, ranching operations, and wildlife;
- The ways in which extreme temperatures, wildfires, flooding, earthquakes, tornadoes, lightning, and shifting ground (as reported in recent Southern Methodist University studies) affect radioactive waste casks and canisters; and
- The financial stability of the new WCS owner, an equity firm that buys and sells companies, and whether it will be able to shoulder the burden of legal and financial responsibility for environmental contamination resulting from WCS's operations, as proposed.

Additionally, the plan provides for inadequate monitoring, security and worker protections. The emergency plan should include a chronological sequence of the specific actions to be taken, rather than providing only a notification structure. It appears that there are no viable plans for action in the event of an emergency.

Sending radioactive waste to Texas would risk our health and security, financial damage, damage to existing businesses, and contamination of our land, air and waterways at the storage sites and along transport routes. An inadequate permanent disposal site could be created since its likely that the waste never get moved to a permanent repository. This waste must remain isolated for a million years in order for its radioactivity to completely neutralize. Storing such waste for decades above ground in extreme climate conditions will not suffice. The NRC should halt its review of WCS's license application for Consolidated Interim Storage in Texas, as well as its review of the Holtec project proposed for nearby New Mexico. In the interest of our public health and safety, both licenses should be denied.

Kristen Bollinger
flotsamjetsam75@gmail.com

Houston, Texas 77057

Federal Register Notice: 83FR44922
Comment Number: 22012

Mail Envelope Properties (5bc55e40bffe4_bf43f9d5c33a340244438fa)

Subject: [External_Sender] NRC-2016-0231; Docket # 72-1050
Sent Date: 10/15/2018 11:42:57 PM
Received Date: 10/15/2018 11:43:19 PM
From: Kristen Bollinger

Created By: info@sg.actionnetwork.org

Recipients:

Post Office: ip-10-0-0-119.mail

Files	Size	Date & Time
MESSAGE	4713	10/15/2018 11:43:19 PM

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received: