

May Ma, Office of Administration,
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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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COMMENT (70)
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CITATION 83 FR 44922

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

September 18, 2018

Dear May Ma and NRC,

Waste Control Specialists and their partner seek to import up to 40,000 tons of spent fuel, high-level radioactive waste, from nuclear reactors around the country and store it on WCS' existing site in Andrews County 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 well-being. 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 legally operate, so the NRC shouldn't even be considering the license application. However, NRC is now pushing forward with new corporate ownership of WCS and a revised application.

We Don't Want It – and We DO Want Public Meetings

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, 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 as much transport of radioactive waste across the country, but the public is being given very little opportunity to speak out.

Please extend intervention and public comment deadlines by at least 180 days to allow for public input, and host public meetings in Dallas, Houston, San Antonio, El Paso, Midland and Andrews.

Inadequate Environmental Review and Emergency Plan

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 and wildlife.

- The impacts of temperature extremes, wildfires, flooding, earthquakes, tornadoes, lightning, and shifting ground (as reported in recent Southern Methodist University studies) on radioactive waste casks and canisters.
- The environmental injustice of dumping high-level radioactive waste on the largely Hispanic West Texas region
- The adequacy of financial assurances, the stability of the new WCS owner, an equity firm that buys and sells companies, and the ties of partner Orano (with a 51%, share) to the French government.
- Improved monitoring, security and worker protections are needed and the emergency plan should include actions to be taken, not just a notification structure. It appears there are no viable plans for action should an emergency arise.

Protect Public Health, Safety and Financial Well-Being - Halt This Project

Sending radioactive waste to Texas would risk our health and security, financial disaster, damage to existing businesses, and contamination of land, air and waterways at the site 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. Storing it for decades above ground in extreme climate conditions does not lead the nation toward this goal. 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. In the interest of our public health and safety both licenses should be denied.

Sincerely,

Darby Riley

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Additional personal comments:

The waste should be kept at or near the sites where generated until a permanent solution is found. Transporting high level radioactive material across country jeopardizes everybody.