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October 4, 2018

SUNSI Review Complete
Template = ADM-013
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ADD= Antoinette Walker-Smith,
James Park, Cinthya Cuevas
Roman, Jenny Weil

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

COMMENT (98)
PUBLICATION DATE: 9/4/2018
CITATION 83 FR 44922

Dear Cindy and the NRC:

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

As a West Texas bishop, I am deeply concerned about the plan 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.

On behalf of my people in Andrews County and the surrounding area, I ask that this permit not be granted. There are too many risks of leakage or accidents. The tectonically active geology of the area is not sufficiently stable for this kind of storage, because of the history of earthquakes and the underlying cave/karst systems.

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, I am concerned that an accident in Andrews County would cause irreparable harm to the public health and common good of West Texas and our neighbors in New Mexico. If any of the casks should fail, or be struck by an act of terrorism, there is the possibility of contamination of our land, our ground water, the local oil fields, and the potash in nearby Lea and Eddy Counties in New Mexico, which contain 70% of the nation’s supply of potash.

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 10,000 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 our area, 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.

Despite local community opposition, the application has been proceeding through the permitting process with few roadblocks. For these reasons, I encourage you to consider the health, safety, and security impacts this initiative will have, and do not approve the permit for the proposed spent fuel storage project in Andrews County, Texas.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Sis".

Most Reverend Michael J. Sis
Bishop of San Angelo

MJS/ch

cc: Jennifer Allmon, Texas Catholic Conference of Bishops