

## WCS\_CISFEISCEm Resource

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**From:** Laura Ziegler <zieweed@gmail.com>  
**Sent:** Wednesday, October 17, 2018 9:02 AM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] NRC Docket 72-1050 NRC 2016-0231

I urge NRC to reject Interim Storage Partners' proposed "centralized interim storage" plan. The Nuclear Regulatory Commission should not allow tens of thousands of shipments of radioactive waste in massive, inadequately secure containers to be transported over the nation's railroad tracks, roads, bridges and waterways. The dangers are compounded by a national infrastructure already known to be antiquated, fragile, and in need of major repair. Federal law prohibits such transport without a permanent repository operating -- but the NRC is apparently disregarding the law.

Besides its illegality, there are many reasons to reject this proposal.

- \* There are valuable industries and interests that the site would threaten. Even some of the hazardous and extractive industries that are a big part of the local economy oppose the dump.
- \* West Texans have experienced environmental racism for decades. People of color continue to be disproportionately impacted by hazardous and toxic wastes.
- \* WCS already has hazardous, radioactive and mixed waste and continues to bring in more to the site proposed for high level waste. There is a uranium enrichment facility next door. The EIS must evaluate the effects of multiple hazards and impacts of accidents, releases, explosions from its neighbors
- \* The area is potentially seismically active and there are large amounts of fracking and other extraction in proximity to the site -- possibly even beneath it.
- \* The site of the proposed CIS facility in Andrews County, Texas is subject to severe weather and climatic conditions that could endanger nuclear waste containers. Extreme temperatures, wind and sand storms, wildfires, lightning strikes and storms, floods, and tornadoes can all impact the site.
- \* WCS seeks a permit to release radioactive and hazardous water to the New Mexico side of its property. There is water at the site and there are nearby major aquifer formations.
- \* Potential sabotage en route to and at the proposed site must be considered, including potential drone attacks.
- \* The period of storage of irradiated fuel at WCS could exceed the expected life of the dry cask containers in which it is stored. NRC must consider the industry's present inability to re-containerize nuclear waste when casks fail, the absence of a facility at the proposed WCS site to perform such operations, and the amount and source of funds to pay for it.
- \* None of today's certified waste containers are designed for real world transport conditions (temperatures, crash speeds, submersion in water) and have not been physically tested (despite dump-promoters' misleading use of 40 year-old crash-test videos on different casks). The storage containers cannot be monitored for potential cracks and leaks, inspected, repaired or replaced even though we know the waste will be dangerous longer than they will last. \*Future\* technology is speculative and invoking it is an inadequate response.

If NRC proceeds on this proposal the process should be comprehensive and accessible. The agency should

- a) Publish the application in Spanish so the process is accessible to Spanish speaking residents in the region.
- b) Hold public meetings along all the potential routes, especially in Texas.
- c) Extended the comment period to 180 days.
- d) Include scope, technical, social, geographic, cultural and international political impacts in the Environmental Impact Statement.

Thank you for considering my concerns.

Ms. Laura Ziegler

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