

WCS_CISFEISCEm Resource

From: Danny Dyche <tolarian@juno.com>
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To: WCS_CISFEIS Resource
Subject: [External_Sender] NRC Docket 72-1050 NRC 2016-0231

Reject the Proposal to consolidate irradiated fuel because it is illegal, not allowed under federal law absent a permanent repository operating. If NRC proceeds, the application should be published in Spanish so residents in the region can review it.

Hold public meetings along all the potential routes, especially in Texas. Extend the time for commenting 180 days.

Include in the Environmental Impact Statement scope, technical, social, geographic, cultural, and political international effects.

WCS already has hazardous, radioactive, and mixed waste and continues to bring in more to the site proposed for high level waste. A uranium enrichment facility is nearby. The EIS must evaluate the effects of multiple hazards and effects of accidents, releases, and explosions from its neighbors.

The area is potentially seismically active and a considerable amount of fracking and other extraction is in proximity to the site, possibly even beneath the site.

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 affect the site.

WCS is seeking a permit to release radioactive and hazardous water to the New Mexico side of its property. Water is at the site, and major aquifer formations are nearby.

Acts of malice and other deliberate sabotage on the way 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.

The proposed area has valuable industries and interests that would be threatened by the site. Even some of the hazardous and extractive industries that are a big part of the economy oppose the dump. West Texans have experienced environmental racism for decades. People of color continue to be disproportionately harmed by hazardous and toxic wastes.

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' misuse of 40 year-old crash-test videos on totally 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. The technology is in the "future" according to NRC staff. Tell the Nuclear Regulatory Commission (NRC) to prevent tens of thousands of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over the nation's railroad tracks, roads, and bridges.

Mr. Danny Dyche
902 SE Marinette Ave
Hillsboro, OR 97123
5038634668

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