

## **WCS\_CISFEISCEm Resource**

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**From:** ERNEST FULLER <fullercogm@gmail.com>  
**Sent:** Thursday, October 18, 2018 10:52 PM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] NRC Docket 72-1050 NRC 2016-0231

I request that the NRC reject the proposal to consolidate irradiated fuel because it does not solve the problem but only exacerbates it by moving fuel around our country. In addition the proposal is illegal because it is not allowed under federal law until there is a permanent repository operating

Please hold public meetings about the proposal in the communities to be affected and along all the potential routes especially in Texas

The NRC must include in the Environmental Impact Statement scope, technical, social, geographic, cultural and political international impacts.

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 site of the proposed CIS facility in Andrews County, Texas is subject to severe weather and climatic conditions that could endanger nuclear waste containers. Earthquakes, extreme temperatures, wind and sand storms, wildfires, lightning strikes and storms, floods, and tornadoes can all impact the site.

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

Acts of malice and other deliberate 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. The 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 this siting. West Texans have experienced environmental racism for decades. People of Color continue to be disproportionately impacted 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. The NRC should prevent thousands of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over the nation's railroad tracks, roads and bridges.

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