

## WCS\_CISFEISCEm Resource

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**From:** Sasha Pyle <info@sg.actionnetwork.org>  
**Sent:** Friday, October 19, 2018 2:11 PM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] NRC-2016-0231; Docket # 72-1050

May Ma ,

RE: Waste Control Specialists LLC's / ISP's Consolidated Interim Spent Fuel Storage Facility Project

Dear May Ma and NRC,

I really don't know who thinks up these terrible ideas. Those people should lose their jobs immediately. We've suffered through so many dangerous, environmentally cavalier nuclear projects in New Mexico that you might think someday the torrent of idiotic risk might subside. But you would be wrong. Now, once again, after decades of broken promises and radioactive materials that simply are destined to come in contact with the biosphere because of their haphazard handling and disposal, we are faced with another such slap in the face.

The so-called "consolidated interim" storage of wastes at the proposed WCS facility is absolutely a sham. From the almost laughably poorly-thought-out transportation scheme, to the use of the word "interim" to describe waste which we all know nobody will ever reclaim once it has been placed in the "sacrifice zone," to the tragic legacy of mutation, disease and death that will befall life in this region if we leave the waste in an area which is riddled with sinkholes, mines, wells and geologic instability--nobody could ever come up with a dumber plan, short of force-feeding nuclear waste to the nation's schoolchildren.

I have spent 30 years educating myself about nuclear weapons manufacturing, nuclear waste disposal, nuclear policy and budgets, and the legal and regulatory frameworks that are intended to protect the public from some of the most toxic materials ever created on this planet.

Because I firmly believe that the public should have input into long-term plans that affect the public, I see it as my responsibility to study the facts and behave like an informed citizen. The WCS proposal makes a mockery of this approach to citizenship. At no moment have the

citizens of Texas and New Mexico been adequately informed of the project's risks, nor of our avenues for involvement. The process has been rushed and abridged, with a sloppy and slipshod approach to discussion of safety and health considerations. A proper Environmental Impact Statement which adequately assesses a range of options, has not been done.

The waste transportation cannot be achieved safely as it is currently proposed; the waste will not be contained in accordance with the established principles of monitored retrievable storage technologies; the regulatory and legal protections will fail residents of the area; 100 years from now no agency or corporation can be relied upon to be around to deal with removing this waste and taking it to a certified long-term disposal site; the state of New Mexico has been repeatedly victimized by toxic and hazardous materials because we are a poor, high-minority-population state; and some idiots will do anything for a dollar now, even if it means exposing all of their descendants to disease and premature death.

We deserve better. This plan is dangerous and insulting. It puts at risk all human (and other) life in this region virtually in perpetuity. I hereby sign onto the below appended comments:

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.

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 until at least 180 days after license application and scoping and intervention materials are made available in Spanish. This extension is needed to allow for adequate public input. Please host public meetings in Dallas, Houston, San Antonio, El Paso, Midland and Andrews and make all public notice and license application documents available in Spanish.

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.

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.

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