

From: [Borges Roman, Jennifer](#)
To: [Ralph, Melissa](#); [Blount, Barbara](#)
Cc: [Park, James](#)
Subject: FW: Docket ID NRC-2016-0231
Date: Tuesday, November 13, 2018 4:22:08 PM

Hello,

Please find below a comment on NRC-2016-0231.

Thank you,

Jennifer Borges

Regulations Specialist

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SUNSI Review Complete
Template = ADM-013
E-RIDS=ADM-03
ADD= Antoinette Walker-Smith, James
Park, Cinthya Cuevas Roman, Jenny Weil

COMMENT (103)
PUBLICATION DATE: 9/4/2018
CITATION 83 FR 44922

From: Laura Watchempino [mailto:5000wave@gmail.com]
Sent: Monday, November 12, 2018 8:43 PM
To: Borges Roman, Jennifer <Jennifer.BorgesRoman@nrc.gov>
Subject: [External_Sender] Docket ID NRC-2016-0231

Dear Nuclear Regulatory Commission,

I urge you to reject the proposal by Waste Control Specialists and its partner to import up to 40,000 tons of high-level radioactive waste from nuclear reactors around the country and store it in Andrews County for 40 years or longer. Exposure to this dangerous waste can lead to cancers, genetic damage, birth defects and even death. Homeowners' insurance doesn't cover radioactive contamination. Importing high-level radioactive waste would create risks to public health, safety and financial well-being.

The NRC has not held a single public meeting on the revised application. The NRC held only one meeting in Texas on the original application, and that was in Andrews, hundreds of miles from major cities that would be impacted by rail transport of radioactive waste. Resolutions opposing the radioactive waste plans and transport were passed by Dallas, Bexar, Nueces and Midland counties and the cities of San Antonio and Denton, but the public has not been given an opportunity to speak out in NRC public hearings.

The WCS Environmental Report is inadequate. It should be expanded to clearly identify:

- All transportation routes that would be used across the country;
- Characterization of all groundwater aquifers beneath the storage facility, including the nearby Ogallala Aquifer, which lies beneath eight states and supplies drinking water for members of the public, agriculture, ranching and wildlife needs;
- 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; and
- The adequacy of financial assurances, the stability of J.F. Lehman, the new WCS owner, and the ties of partner Orano (which has a 51 percent project share) to the French government.

Improved monitoring, security and worker protections are needed, and the emergency plan should include actions to be taken in the event of an accident, not just a notification structure. It appears there are no viable plans for action should an emergency arise.

Sending radioactive waste to this site would risk public health and security for residents near the site and along transportation routes. The region around WCS has a high proportion of low income, Latin American residents who are already heavily burdened with nuclear activities (radioactive waste dumping, uranium enrichment, etc.) and dirty fossil fuel industries (widespread, heavily polluting oil extraction and natural gas fracking). WCS would launch unprecedented numbers of high-risk irradiated nuclear fuel train (and even barge) shipments through many states.

An inadequate permanent disposal site could be created since it's likely that the waste will never get moved again to a permanent repository. This waste will be dangerous for a million years. Storing it for decades above key regional aquifers in extreme climate conditions is too risky. In the interest of our public health and safety, this license should be denied.

Thank you for your consideration of my concerns.

L. Watchempino