

**Western North Carolina Chapter, Physicians for Social Responsibility Scoping
Comments on Interim Storage Partners/ Waste Control Specialists/ Orano (WCS)
Consolidated Interim Spent Fuel Storage Facility Project**

Western North Carolina Chapter
Physicians for Social Responsibility
Post Office Box 6689
Asheville, North Carolina 28816

November 16, 2018

May Ma, Office of Administration, Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001
Via email: [WCS CISF EIS@nrc.gov](mailto:WCS_CISF_EIS@nrc.gov) ATTN: Docket ID NRC 2016-0231

James Park, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001 301-415-6954;
James.Park@nrc.gov.

Docket No. 72-1050; NRC-2016-0231
Waste Control Specialists LLC's / ISP's
Consolidated Interim Spent Fuel Storage Facility Project

To the Nuclear Regulatory Commission:

We contend that the NRC is illegally processing the applications for Consolidated or Centralized Interim Storage facilities. We provide these comments in this apparently unlawful process to preserve our right to have these issues addressed.

The Interim Storage Partners/Waste Control Specialists/Orano (WCS) application to store up to 40,000 metric tonnes (MTU) of irradiated nuclear fuel/ high-level radioactive waste (possibly including Greater than Class C waste) from nuclear power reactors around the country in Andrews County, TX will cause thousands of unnecessary nuclear waste shipments across the US, possibly twice.

Please ensure the Environmental Impact Statement (EIS) includes the risks of national transportation, local transport in the vicinity of the proposed site, as well as the risks of the site becoming permanent by default. Include transportation methods, specific routes, and all their potential impacts in the Environmental Impact Statement. Address the potential for reprocessing at the site as consolidation of irradiated fuel increases the likelihood of reprocessing.

The Environmental Impact Statement (EIS) for Waste Control Specialists' license application should include:

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

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- 1. A designation of national and local transportation routes and modes of transport TO and FROM WCS's Andrews, Texas site and the array of potential impacts of accidents or malicious attacks that could occur along those routes, including the legally allowed routine radioactive emissions from transport and storage casks.**
- 2. The EIS should address the impacts of "interim storage" becoming a dangerous permanent de facto disposal. The waste may never be disposed of in a scientifically viable, geologic repository using a reliable isolation system.**
- 3. Currently there is no way to re-containerize the waste if and when needed. The EIS must analyze and explain how WCS will do this now and how they will guarantee it can be done in perpetuity. The EIS must cover the millions of years the waste will stay dangerous—consider the future as there is NO GUARANTEE in the license that the waste will ever leave.**
- 4. The statement should include how radioactive waste from a cracked and leaking canister would be handled, as it appears there would be no wet pool or hot cell at the WCS site. It appears that no one knows yet how to transfer waste from dry cask to dry cask. WCS and the EIS should outline how this would be accomplished ahead of time and identify the facilities and equipment that will be available to carry out such re-containerization activities.**
- 5. Assess health threats to the human life cycle. Since there is hazardous and mixed waste at the WCS site, the EIS must review the multiple, additive, cumulative and synergistic effects of radioactivity and hazardous waste on workers, residents, people of all ages with varying susceptibilities to radiation, animals, plants, microbes, water, soil, etc. Please clarify the physical impacts of hazardous materials on WCS's many sites and nearby facilities (including the Urenco uranium facility, immediately next door to the proposed storage area) on people (especially the most vulnerable stages of our human life cycle-females, babies and youth), on all animals, endangered species, plants, the ecosystem, air and water, environment, cultural and social institutions and communities, etc. (See point 9 below.)**

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6. Assess the economic threats to the industries and businesses that drive the economic engines of the communities, including oil and gas, farming, ranching, dairy and others.

7. Above-ground casks would be exposed to the weathering effects of temperature extremes, and potential wildfires, tornadoes, and earthquakes. The EIS should address these issues and answer the following questions: At what point could the waste go critical? What contact with other radioactive waste and hazardous materials at the WCS site could occur? What are the cumulative impacts of waste at this site and nearby sites on workers, local people and the environment, and how could natural disasters add to or multiply impacts?

8. The EIS should independently review the risk of groundwater contamination at the site, especially since all of the technical and administrative reviewers at the Texas Commission on Environmental Quality TCEQ recommended denying the license for “low-level” radioactive waste at the Waste Control Specialists site due to the inability to guarantee protection of groundwater.

9. In-depth research should examine radiation monitoring and cumulative impacts of multiple facilities near the WCS site, site security, engineering adequacy of the storage pad and seismic stresses, the adequacy of the crane that would move radioactive waste.

If the license gets approved, deadly waste would be transported through communities, farmland, sensitive natural areas, and watersheds throughout the country for 24 years. Even one small accident would be one too many. Despite assurances that accident damage would be minimal, real life disasters have been known to exceed the worst anticipated scenarios.

Please know that we don’t consent to and support local communities that do not consent to becoming a national radioactive waste dumping ground. We should not have to risk contamination of our land,

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aquifers or air or the health of plants, wildlife and livestock. Human exposure to high-level radioactive waste can lead to immediate death.

10. The EIS should reveal who will pay in cases of contamination. Homeowners' insurance doesn't cover radioactive contamination. A single rail car could haul waste containing as much plutonium as the bomb dropped on Nagasaki. There have been serious train accidents throughout the country in recent years, including near the WCS site. Two trains have collided head-on in West Texas last year at 65 mph. The casks on the market today have never been tested, cannot be inspected for cracks and are not designed to meet real road, barge, or rail conditions that they would encounter in transit.

The EIS should address these potential dangers and worst case scenario consequences. Consider the potential impacts from accidents or radioactive waste related acts of malice along transport routes and at the site, including impacts to people, land, air, crops, animals and water.

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

Please hold public meetings--none are now planned--Hold them communities and 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 impacts.

SYNERGISTIC EFFECTS --

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

EARTHQUAKES--

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The area is potentially seismically active and there are large amounts of fracking and other extraction in proximity to the site, possibly even beneath the site!

SEVERE WEATHER and CLIMATIC CONDITIONS

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.

PROXIMITY TO WATER--

WCS is seeking 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.

ACTS OF MALICE and OTHER DELIBERATE SABOTAGE en route to and at the proposed site must be considered, including potential drone attacks.

STORAGE CONTAINER SYSTEMS

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.

ENVIROMENTAL and ECONOMIC JUSTICE--

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 impacted by hazardous and toxic wastes.

TRANSPORT DANGERS--

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-

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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 10's of 1000's of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over the nation's railroad tracks, roads and bridges.

Respectfully Submitted,


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