WCS_CISFEISCEm Resource

From: Peter Gunther <avengethecathars@juno.com>
Sent: Thursday, October 25, 2018 8:43 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Docket No. 72-1050; NRC-2016-0231 Waste Control Specialists LLC's / ISP's Consolidated Interim Spent Fuel Storage Facility Project

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.

Please extend public intervention and public comment deadlines by at least 180 days to allow for public input, and host public meetings in Dallas, Houston, San Antonio, El Paso, Midland and Andrews – and other locations that would be impacted by this proposal.

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

•Transportation routes that would be used across the country; •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; 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. An inadequate permanent disposal site could be created since it's likely that the waste will never get moved to a permanent repository. This waste will be dangerous for a million years. Storing it for decades above ground 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.

Sincerely,

Peter Gunther

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Federal Register Notice: 83FR44922
Comment Number: 23730

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