# **WCS CISFEISCEm Resource**

From: Linda Cooke lindaccooke@att.net>
Sent: Monday, November 19, 2018 10:12 AM

To: WCS\_CISFEIS Resource

**Subject:** [External\_Sender] NRC Docket 72-1050 NRC 2016-0231

NRC - WCS EIS 2018

RE: NRC Docket 72-1050 NRC 2016-0231

Dear,

I strongly object to the proposed transport and storage of nuclear waste in Andrews, TX. This waste will likely be transported by rail only a few miles from my home in Dallas, exposing me and thousands of my neighbors to the risk of accidental exposure if a rail accident or leak occurs.

I assure you, most people in Dallas do not know about this proposal, based on response to outreach being done by the activist community here. As I am writing this, I am hearing a report about the proposal on the local public radio station, the first I have heard on the local media. It does not mention that this is the last day to file a protest with the NRC.

The term "Interim" is disingenuous and intentionally deceptive. Once this waste reaches the proposed storage facility, it will be dumped there and never moved again. The accumulation of waste will create a concentration of risk to the entire region that is not warranted. The waste should be stored on the site where it originates until a permanent disposal solution is reached. This will avoid potential exposure to hundreds of thousands of unknowing people who have not been informed of what is being planned for their future.

I am requesting that you 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--**

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-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.

Texas, like most of the U.S. in these times, has crumbling infrastructure and a history of rail accidents. The rail system in this area is particularly under stress, with increased shipments of heavy tar sands bitumen and heavy crude destined for coastal refineries, due to the boom in gas&oil production. This is no place for nuclear waste transport!

Sincerely, Ms. Linda Cooke 4029 Lively Lane Dallas, TX 75220 Federal Register Notice: 83FR44922 Comment Number: 25549

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