

WCS_CISFEISCEm Resource

From: Protecting NM From All Things Nuclear <protectnewmexico@gmail.com>
Sent: Tuesday, November 20, 2018 12:26 AM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Docket # NRC-2016-0231
Attachments: 2018-11-19 NISG WCS Scoping letter.pdf; ATT00001.htm

NRC,

Please accept our letter for submission to the Docket #NRC-2016-0231.
Thank you,

Leona Morgan
+1 505 879 8547
Nuclear Issues Study Group

Federal Register Notice: 83FR44922
Comment Number: 27157

Mail Envelope Properties (68AC6B1B-6BF5-479D-83DE-1FF5677D3ED6)

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2018-11-19 NISG WCS Scoping letter.pdf		288971
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Nuclear Issues Study Group

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November 19, 2018

May Ma, Office of
Administration, Mail Stop: TWFN-7- A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: NRC-2016-0231; Docket # 72-1050; Waste Control Specialists LLC's / ISP's Consolidated Interim Spent Fuel Storage Facility Project

Dear May Ma and NRC,

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's existing site in Andrews County for 40 years (or longer). Importing high-level radioactive waste from various parts of the United States would create risks to public health, safety, and financial well-being. This project and a similar proposal by Holtec International for the state of New Mexico should be halted immediately!

Under the Nuclear Waste Policy Amendments Act of 1987, the WCS facility cannot legally operate without there first being a permanent repository established. Therefore, this revised application by the owners of WCS should not even be considered!

Many Texans and New Mexicans have voiced opposition to the WCS proposal and related transport. However, such complaints fall on deaf ears as the NRC has not allowed for public participation in the form of public meetings on this issue. At this time, NRC has held only one meeting in Texas regarding the CIS project in Andrews, Texas. 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.

The necessity to allow public consultation derives from the fact that decades of transporting radioactive waste across the country would affect the environment and livelihoods of communities along the transport route as well as the host community. Due to this fact, resolutions opposing the radioactive waste plans and transport were passed by Dallas, Bexar, Nueces and Midland counties and the Cities of San Antonio and El Paso, yet NRC has failed to host meetings in any of these locations, even for the original application.

Additionally, several cities and counties in New Mexico have passed resolutions opposing the transport of high-level radioactive waste from Holtec and WCS, including: the Counties of Bernalillo, Santa Fe, and McKinley and the Cities of Albuquerque, Gallup, Jal, Lake Arthur, Las Cruces, Belen, and the Navajo Nation Chapter of Churchrock, NM

Since the revised application, there has not been any further or additional interaction with the public. Because of this, we ask that you allow for adequate public input by hosting public meetings in Dallas, Houston, San Antonio, El Paso, Midland and Andrews.



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(WCS Public Scoping Comments by NISG to NRC, page 2)

Secondly, it is necessary to make all notices and relevant documents available in Spanish and appropriate local native languages for any people near the proposed storage site, along transport routes who primarily speak Spanish or locals native languages. Because of this language barrier, please allow for an extended intervention and public comment deadline until at least 180 days *after* license application, scoping, and intervention materials are made available in Spanish and other appropriate languages.

Additionally, host meetings in communities along the entirety of transport routes in other states, including areas with large populations along the rail lines, such as Chicago, St. Louis, Albuquerque, and others.

Lastly, the 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;
- Environmental Justice issues related to 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, and an emergency plan, not just a notification structure; It appears there are no viable plans for action in case of emergency;
- Risks to places sacred to indigenous nations and communities along rails and possible transportation routes, such as two of the four sacred mountains of the Diné people (Navajo Nation): Mt. Taylor in Grants, New Mexico and San Francisco Peaks in Flagstaff, Arizona.

Sending radioactive waste to the Southwest would risk our health and security. For relatively few permanent jobs, we will risk financial disaster, damage to existing businesses, and contamination of land, air, and waterways at the site and along transport routes. 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.

Sincerely,

Leona Morgan
Co-Coordinator & CIS Committee
Nuclear Issues Study Group

Denise Brown
CIS Committee
Nuclear Issues Study Group

