

## WCS\_CISFEISCEm Resource

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**From:** Sigrid Asmus <essay@nwlinc.com>  
**Sent:** Tuesday, November 20, 2018 7:58 AM  
**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

Nuclear Regulatory Commission WCS Waste Storage Application

RE: 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 WCS Waste Storage Application,

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, Texas, for 40 years or longer.

Transportation of material like this is extremely dangerous, and imagining that 40 years is long enough to store it is out of line with solid scientific information. Forty years is actually laughable, as waste of this kind remains radioactive and harmful to everything it comes in contact with for countless thousands of years.

Exposure to this dangerous waste can and would lead to cancers, genetic damage, birth defects, and even death. Homeowners' insurance does not cover radioactive contamination. Importing high-level radioactive waste would create permanent risks to public health, safety, and financial well-being. The radiation cannot be seen, but will remain lethal for far longer than a mere 40 years.

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, and that is unconscionable.

We don't even have a way of attaching warnings to waste like this that would be readable until it loses its radioactivity. But both the planned failure to hold public meetings right from the start, and the failure to provide any kind of environmental impact statement, show that the NRC must not to be trusted.

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. To me, this is evidence of a concerted cover-up arranged by NRC and its unaccountable owners, officers, and members.

I want public intervention, investigation, and public comment deadlines extended by at least 180 days to allow for public input. I also demand that NRC host open public meetings in Dallas, Houston, San Antonio, El Paso, Midland, and Andrews – and all other locations that would be impacted by this proposal, especially those along the transport route, and in the area where the "dump" is to be cited. The disposal of nuclear waste that will be dangerous to for countless years must not be covered up by a corporation seeking to remain unaccountable.

Moreover, the WCS Environmental Report is grossly inadequate. It should and must be expanded to clearly identify:

- All transportation routes and modes of transport that would be used across the country, in detail, along with plans to be followed in case of spill, derailments, or other accidents;
- Risks to groundwater and the nearby Ogallala Aquifer, which lies beneath eight states, providing almost the only safe source for drinking water and water for agriculture, ranching, and wildlife for a huge area of the midwest;
- 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 must be specifically addressed;
- The environmental injustice of dumping high-level radioactive waste on the largely Hispanic West Texas region must not be supported; 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 must be investigated in detail. Highly radioactive material would absolutely remain radioactive long after these owners or groups stepped away from the project.

More specifically, strong and improved monitoring, security, and worker protections are needed, with penalties for violations of these standards. The emergency plan must include actions to be taken in the event of an accident. The existence of nothing but a "notification structure" is unacceptable. It is appalling that there are no viable plans for action should an emergency arise, and that lack must be remedied if the project goes ahead.

Sending radioactive waste to this site would risk public health and security for residents near the site and along transportation routes for countless centuries.

A grossly inadequate permanent disposal site could be created -- as happened at Hanford, Washington -- since it's likely that the waste will never get moved to a permanent repository. That must not happen, as 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,

Sincerely,  
Sigrid Asmus

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