

## WCS\_CISFEISCEm Resource

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**From:** WCS\_CISFEIS Resource  
**Sent:** Thursday, December 27, 2018 1:48 PM  
**To:** WCS\_CISFEISCEm Resource  
**Subject:** FW: Docket No. 72-1050 NRC-2016-0231

-----Original Message-----

From: Judith Miller (jlmillerconsultants@gmail.com) Sent You a Personal Message [mailto:automail@knowwho.com]  
Sent: Sunday, November 18, 2018 4:15 PM  
To: WCS\_CISFEIS Resource <WCS\_CISFEIS.Resource@nrc.gov>  
Subject: [External\_Sender] Docket No. 72-1050 NRC-2016-0231

Dear Nuclear Regulatory Commission,

I urge you to reject the WCS proposal for a consolidated interim storage site, where numerous used, highly radioactive fuel cores would be stored at one location.

Under federal law, such a site is not allowed until a permanent repository is operating.

Public meetings should be held in communities along all the potential routes, especially in Texas. The time for commenting should also be extended 180 days.

The Environmental Impact Statement should include technical, social, geographic, cultural and political international impacts, and the entire suite of public documents relating to the WCS application should be provided in Spanish.

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.

The proposed site is potentially seismically active and is a hot spot for horizontal fracking, and reinjection of produced water from fracking has been shown to significantly increase earthquake risk.

The site of the proposed CIS facility 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.

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. The site is near the Ogallala Aquifer, which has dropped so much that the recognized boundary has been moved farther from the WCS site.

Acts of sabotage en route to and at the proposed site must be considered, including potential drone attacks. Concentrating all this waste at one location raises the likelihood of terrorist attacks.

The period of storage of irradiated fuel at WCS could exceed the expected life of the dry cask containers that store the waste. 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.

Industries that operate near the proposed site would be threatened by high-level nuclear waste being stored there. West Texans have experienced environmental racism for decades. People of color and lower-income residents continue to be disproportionately impacted by hazardous and toxic waste.

None of today's certified waste containers are designed for real-world transport conditions (temperatures, crash speeds, submersion in water) or have been physically tested despite promoters' misuse of 40-year-old crash-test videos on 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. NRC - WCS EIS 2018

Email:WCS\_CISF\_EIS@nrc.gov

Sincerely,

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