

**Environmental Impact Statement
Scoping Process**

Summary Report

**The ISP CISF Environmental Impact
Statement Public Scoping Period**

October 2019



**U.S. Nuclear Regulatory Commission
Rockville, Maryland**

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A The ISP CISF Environmental Impact Statement Public Scoping Period

A.1 Introduction

In April 2016, Waste Control Specialists LLC (WCS) submitted a license application to the U.S. Nuclear Regulatory Commission (NRC), including a Safety Analysis Report (SAR) and Environmental Report (ER), requesting authorization to construct and operate a Consolidated Interim Storage Facility (CISF) for spent nuclear fuel (SNF) at WCS's existing hazardous and Low-Level Radioactive Waste (LLRW) storage and disposal site in Andrews County, Texas. The function of the CISF would be to store SNF and reactor-related Greater Than Class C (GTCC) LLRW generated at commercial nuclear power reactors. The SNF and reactor-related GTCC LLRW would be transported from commercial reactor sites to the CISF by rail. Although the initial license request is to store 5,000 metric tons of uranium (MTU) at the CISF, WCS has stated its intent to submit future license amendment requests such that the facility could eventually store up to 40,000 MTU.

On April 18, 2017, WCS requested that the NRC suspend its licensing review. On June 8, 2018, Interim Storage Partners, LLC (ISP), a joint venture of WCS and Orano CIS LLC (a subsidiary of Orano USA), requested that NRC resume the licensing process (ISP, 2018a). With this request, ISP submitted a revised license application, later updated on July 19, 2018, to the NRC, which included a revised SAR (ISP, 2018b) and ER (ISP, 2018c). The revised application requests authorization to construct and operate a CISF for SNF and reactor-related GTCC radioactive waste (collectively referred to as SNF) as well as a small amount of mixed oxide fuel at the WCS site. ISP prepared the revised license application in accordance with requirements in Title 10 of the *Code of Federal Regulations* (10 CFR), Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C Waste."

The NRC is preparing an environmental impact statement (EIS) in accordance with Section 51.20(b)(9) of 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," which implements the National Environmental Policy Act of 1969 (NEPA). The NRC published a notice of intent (NOI) to prepare an EIS in the *Federal Register* (FR) and began its scoping process on November 14, 2016 (81 FR 79531). As part of its scoping and environmental review processes, the NRC staff requested public comments, attended a site visit of the proposed facility, held information gathering meetings with local governments, and held public scoping meetings in Hobbs, New Mexico; Andrews, Texas; and Rockville, Maryland. Additional information can be found in Section A.4 of this report.

The scoping meetings were designed to elicit input from the public and government and private sector agencies and organizations on the scope of NRC's environmental review for the proposed action. The comments received have helped the NRC staff determine the significant issues to be analyzed in detail in the EIS. Details of these meetings (i.e., slides, handouts, and transcripts) are available on the NRC public web page for this project: <https://www.nrc.gov/waste/spent-fuel-storage/cis/waste-control-specialist.html>. Additionally, the comments received are addressed in later sections of this scoping summary report.

This scoping summary report summarizes comments and information the NRC gathered during the scoping process. Section A provides a concise summary of the NRC's scoping process for the EIS, an overview of the issues that were raised (Section A.7), and a summary of the NRC's determinations regarding the scope and content of the EIS (Section A.8). Section B contains summaries of comments received during the public scoping period and the NRC's responses.

These responses contain conclusions on the scope of the EIS, including identification of any significant issues. Section C contains an alphabetized table that identifies the individuals that provided comments, their affiliation if provided, and the Agencywide Documents Access and Management System (ADAMS) Accession number that can be used to locate the correspondence. Section D provides references cited throughout the report. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

A.2 Background

In November 14, 2016, the NRC published a Federal Register Notice (FRN) announcing NRC's intent to prepare an EIS, conduct scoping, and request public comment (81 FR 79531). With this FRN, the NRC opened the public scoping comment period for the EIS, a period that closed on April 28, 2017 (82 FR 14039). Following ISP's request that NRC resume the licensing process, the NRC issued an FRN on September 4, 2018, announcing re-opening of the scoping period for an additional 45 days (83 FR 44922), which was later extended to close on November 19, 2019 (83 FR 53115). Thus, a total of 243 days was provided for the public to submit scoping comments to the NRC. Given that NRC staff guidance in NUREG-1748, "Environmental Review Guidance for Licensing Actions Associated with NMSS Programs" (NRC, 2003) recommends a minimum 45-day scoping comment period, the NRC determined that 243 days constituted ample time for comments to be prepared and submitted to the NRC.

A.3 Environmental Impact Statement

The proposed action is the issuance to ISP, under the provisions of 10 CFR Part 72, of an NRC license authorizing the construction and operation of the CISF at the WCS site in Andrews County, Texas. The function of the CISF would be to store SNF and reactor-related GTCC LLRW generated at commercial nuclear power reactors. The SNF and reactor-related GTCC LLRW would be transported from commercial reactor sites to the CISF by rail. During operation, the proposed CISF would receive SNF from decommissioned reactor sites, as well as from operating reactors prior to decommissioning. The CISF would serve as an interim storage facility before a permanent geologic repository is available. Although the initial license request is to store 5,000 MTUs at the CISF, ISP has stated its intent to submit future license amendment requests such that the facility would eventually store up to 40,000 MTU. ISP's expansion of the proposed project (i.e., beyond an initial phase) is not part of the proposed action currently pending before the agency. However, the NRC staff will consider the expansion phases in its description of the affected environment and impact determinations in the EIS, where appropriate, when the environmental impacts of the potential future expansion were able to be determined so as to conduct a bounding analysis for the proposed CISF project. The NRC staff is conducting this analysis as a matter of discretion, because ISP provided the analysis of the environmental impacts of the future anticipated expansion of the proposed facility as part of its license application (ISP, 2018a,b).

ISP envisions the CISF to be constructed in eight phases with each phase designed to store up to 5,000 MTU; therefore, ISP analyzed the environmental impacts in the license application for storage of 40,000 MTU. ISP, however, will be required to submit license amendment requests to increase its storage capacity beyond the initial 5,000 MTU phase. The NRC would conduct safety and environmental reviews for any subsequent license amendment request to increase the facility's storage capacity. ISP is requesting a license for a period of 40 years. The license application relies on selected TN Americas and NAC International dry cask storage systems, which would prioritize SNF stored at shutdown and/or decommissioned reactor sites. Additional storage systems and SNF currently located at operating reactor sites would be addressed via

potential future license amendments. Renewal of the license beyond 40 years would require ISP to submit a license renewal request, which would be subject to separate safety and environmental reviews [i.e., an Environmental Assessment (EA) or EIS]. Therefore, the current EIS will evaluate the initial licensing period of 40 years. By the end of the license term of the proposed CISF (40 years plus subsequent renewals, if approved), the NRC expects that the SNF would be shipped to a permanent geologic repository. This expectation of repository availability is consistent with NUREG–2157, (NRC, 2014), which concluded that a reasonable period of time for the development of a repository is approximately 25 to 35 years (availability by 2048), based on experience in licensing similarly complex facilities in the United States (U.S.) and national and international experience with repositories already in progress.

A separate safety review, conducted in parallel with the environmental review, will address the safety of SNF receipt, transfer, and storage operations and related activities at the proposed CISF in Texas. While the proposed action does not include or require a specific license for transportation of radioactive material or approval of specific transportation routes, the EIS will include a discussion of the impacts of transportation for representative shipments to and from the proposed facility. Transportation of SNF to the proposed CISF would be primarily or entirely by rail.

A.4 Scoping Process

On November 14, 2016, the NRC staff opened the scoping period and subsequently extended the scoping period until April 28, 2017. During this period, the NRC staff hosted four meetings to allow members of the public to provide oral scoping comments. These meetings were held in Hobbs, New Mexico on February 13, 2017; in Andrews, Texas on February 15, 2017; and at the NRC Headquarters in Rockville, Maryland (also via webinar) on February 23 and April 6, 2017. The NRC staff's meeting slides, handouts, and project fact sheets were available in both English and Spanish at the scoping meetings, and these slides, handouts, and fact sheets, as well as the transcripts for each meeting, are available at NRC's public web page at <https://www.nrc.gov/waste/spent-fuel-storage/cis/wcs/public-meetings.html>. On September 4, 2018, the NRC staff reopened the scoping period for the ISP license application until November 19, 2018. Comments received during this re-opened scoping period were considered by the NRC, along with all comments received during the previous period, in determining the scope of the EIS.

Written comments were accepted via the Federal rulemaking website (www.regulations.gov) using Docket ID NRC–2016–0231, through email to WCS_CISF_EIS@nrc.gov, fax, or regular U.S. mail. The scoping process provided an opportunity for members of the public to identify issues and highlight concerns related to the proposed CISF. The purpose of the scoping process (83 FR 44923) is to:

- Ensure that important issues and concerns are identified early and are properly studied
- Identify alternatives to be examined
- Identify significant issues to be analyzed in depth
- Eliminate unimportant issues from detailed consideration
- Identify public concerns

A.5 Public Scoping Meetings

As discussed in the prior section, the NRC staff hosted four public scoping meetings. Comments made during these meetings were transcribed. All transcribed comments from the scoping meetings, as well as any written comments submitted in person during the scoping meetings, were considered by NRC staff and are included in the comment summaries in this report.

To accommodate members of the public with limited English proficiency, the NRC staff provided presentation slides, a fact sheet about the project, and information about how to comment on the project in Spanish. These materials are also available on the NRC website (<https://www.nrc.gov/waste/spent-fuel-storage/cis/hi/public-meetings.html>).

To announce the four public scoping meetings, the NRC staff used a variety of methods, including social media (NRC's Facebook and Twitter accounts), electronic media (FRNs, NRC press releases, NRC's public meeting notification system website, and direct email notifications), and more traditional media (newspapers and radio). During each meeting, future meetings were announced.

Advertisements for the meetings were placed in the following print and radio venues:

- Andrews County News
- Hobbs News-Sun
- Carlsbad Current Argus
- New Mexico Public Radio (KENW-FM)

A.6 Comments Received During the Scoping Period

Following the conclusion of the scoping period, the NRC staff reviewed the written correspondence and the oral comments received at the public scoping meetings. The NRC staff identified comments made by each commenter, giving each commenter and their individual comments a unique alphanumeric designation to be used for tracking and sorting.

Initially, the NRC staff sorted the identified scoping comments according to subject matter or according to the general topic. Then, comments with similar specific objectives or concerns were further grouped to capture the common issues that had been raised in the source comments. With the comments thus grouped according to subject area, the NRC staff determined the appropriate response for sets of similar comments to explain how the comments related to the scope of the EIS.

The NRC summaries of comments and responses to the comments are presented in Section B of this report. Section C contains a table that identifies all commenters and the ADAMS Accession numbers where their comments can be found.

Among the approximately 29,430 pieces of comment correspondence, the NRC staff identified that approximately 28,350 of these pieces of correspondence involved the submission of a form letter. Comments contained in these form letters were captured in this Scoping Summary Report just once, with all commenters who submitted an exact copy of the form letter grouped together and the comments referenced by a single ADAMS Accession number. Additional comments that were added to form letters are captured separately in this report.

In total, through the avenues for submitting comments [e.g., transcripts from the public webinar and public meetings, mail, on www.regulations.gov (NRC-2016-0231), and fax] the NRC identified approximately 3,200 unique scoping comments.

For purposes of clarity, the NRC staff also notes that some comments refer to WCS as the license applicant or to the WCS application. These comments were submitted during the initial scoping period (i.e., November 14, 2016 to April 28, 2017) when WCS was the applicant. Other comments (i.e., those submitted during the subsequent scoping period of September 4, 2018 to November 19, 2018) refer to ISP when it was the applicant. The NRC, in its responses to all comments, has consistently referred to ISP since it is the current applicant or to the “WCS site” which is the proposed location for the CISF.

A.7 Issues Raised During the Scoping Period

As the NRC staff reviewed the meeting transcripts, e-mails, and other written correspondence, comments were extracted and organized into broad categories, and then within a category, further organized by topic area or issue. These comment categories and their major topics and issues of concern within each category are listed next. The bulleted topics and issues under each category are not meant to be exhaustive but include the most common issues identified in the scoping comments.

NEPA and Public Process

- General comments expressing support or opposition to the project or transportation of SNF
- General comments regarding NRC’s NEPA process
- Comments on NRC’s NEPA process, specifically regarding public participation
- National Historic Preservation Act (NHPA) Section 106 consultation; specifically, consultation with Federally-recognized Tribes
- Requests for additional public meetings, especially along transportation routes
- Suggested improvements for submitting comments and overall meeting process
- Public access to information
- Requests for translated materials
- Questions and concerns regarding consent-based siting
- Collaboration with other agencies and experts

Assumptions and Timeframe of the Analysis

- Concerns that the storage will not be temporary and that the site may become a *de facto* permanent disposal site
- Loss of future institutional controls
- The availability of a permanent geologic repository
- Use of the NRC’s Continued Storage Generic Environmental Impact Statement (GEIS)
- Repackaging of SNF and dry transfer systems (DTS)

Alternatives

- The No-Action alternative (no construction or operation of the proposed ISP CISF)
- Requests to consider hardened onsite storage (HOSS) as a storage alternative at existing sites
- Suggestions for use of alternate technologies to disposition SNF

Land Use

- General land use impacts from SNF storage
- Impacts from storing SNF/high-level waste (HLW) at the existing WCS LLRW disposal facility

Transportation

- Concerns about accidents during transportation and safety of those living near transportation routes
- Amount of national SNF transportation required for centralized interim storage and disposal compared to disposal only
- Concern about access and condition of the transportation infrastructure

Surface and Ground Water

- Radiological contamination of surface water and groundwater from the proposed facility or from accidents during transportation

Ecology

- Impacts to various ecosystems and assessment of potential mitigation measures

Meteorology and Air Quality

- Impacts of climate change, including severe weather events that may be a result of climate change

Socioeconomics

- Socioeconomic implications (including economic and tax considerations) of SNF storage at the CISF
- Jobs generated from the construction, operation, and decommissioning of the facility

Environmental Justice

- Concerns that the proposed project represents an environmental injustice to minority or low-income populations
- Opposition to SNF being transported through communities, particularly minority or low-income communities, along all transportation routes

Cost Considerations

- Cost of consolidated interim storage of SNF, including liability and accident recovery
- Concerns about assumed benefit from the proposed facility

Radiological Health

- Radiological doses that could be incurred from SNF storage and transportation
- Concerns about the approaches used for radiological impact analysis and safety regulations
- General concerns regarding radiological impacts to workers and the public

Cumulative Impacts

- Cumulative impacts from spent fuel storage leaks and accidents to a variety of resources, including radiological health and surface and groundwater
- Overlapping impacts from other radiological facilities in the area
- Historical or legacy radiological impacts in the area
- Concerns about impacts to the Permian Basin and ongoing oil and gas development

Accidents

- Hazards to SNF because of natural events, including flooding and other extreme weather events
- Seismic risks to and general accident susceptibility of dry casks

Safety

- Concerns regarding dry casks and high-burnup fuel
- Concerns regarding dry casks and canister designs
- Embrittlement, stress corrosion cracking, and other potential types of dry-cask degradation

Security and Terrorism

- Vulnerability of dry casks to terrorist attack
- Vulnerability of transportation casks in transit to the CISF
- Concerns regarding generic analysis of environmental impacts from malevolent events

Other Issues

- General site-specific concerns at other NRC-licensed and non-NRC licensed sites (e.g., safety or radiological health concerns at proposed and existing reactor sites)
- Requests and demands for replacing nuclear energy with renewable forms of energy, such as wind, solar, and geothermal

- Comments specific to the Yucca Mountain proceeding, including concerns about the general need for but lack of a permanent repository
- Concerns about legacy nuclear testing or radiological facilities that are not in the vicinity of the proposed CISF
- General opposition to nuclear power
- General support of nuclear power
- Requests and demands to stop nuclear waste production by ending licensing reviews and decommissioning existing nuclear facilities

A.8 Scope of the ISP CISF EIS

As a result of the scoping process, the NRC staff identified and eliminated peripheral issues that will not be addressed in the ISP CISF EIS, consistent with 10 CFR 51.29(a)(3). Section B of this document, “Responses to Scoping Comments,” provides the NRC staff responses that discuss why particular topics or concerns are outside the scope of the EIS or indicate that these concerns or topics are in scope and will be evaluated and documented in the EIS. In many cases, the NRC cannot state the degree of specificity of analysis that will be applied to these in-scope issues. Commenters should not expect that every item identified as “in scope” for the EIS will receive the same level of review and analysis. The degree of analysis for each resource will be determined based on the scope, complexity, nature, and intensity of the potential impacts with respect to the affected environment.

The general scope of the EIS includes an evaluation of the environmental impacts of consolidated interim storage of SNF at the proposed CISF location and reasonable alternatives, including the No-Action alternative. In the following discussion, the NRC staff outlines its current approach to the structure of the EIS, chapter by chapter. The EIS, which will be published for public comment, may adopt a different format than is outlined here.

Chapter 1 of the EIS will provide an introduction to the proposed action, purpose and need for the proposed action, and reasonable alternatives to the proposed action; outline the specific assumptions that informed the analyses contained in later chapters of the EIS; and list applicable regulations and related environmental documents used in the environmental review.

Chapter 2 of the EIS will describe ISP’s proposed CISF facility characteristics and activities that are used to assess the environmental impacts that may occur from licensing the construction and operation of the proposed facility to store SNF.

Chapter 3 will contain a discussion of the affected environment that exists at and around the proposed project location, and, with Chapter 2, will form the basis for assessing the potential impacts to the environment in Chapter 4. The affected environment will include the following resource areas: land use, socioeconomics, environmental justice, air quality, geology and soils, water resources (surface water and groundwater), ecological resources (terrestrial and aquatic resources), historic and cultural resources, noise, visual and scenic resources, waste management, transportation, and public and occupational health.

Chapter 4 will include the NRC staff’s evaluation of the environmental impacts associated with the construction of the proposed CISF, the storage of SNF at the proposed location, and the decommissioning of the CISF. This chapter will also include a discussion of potential mitigation measures that could reduce or avoid adverse environmental impacts.

Chapter 5 will consider and evaluate the cumulative impacts that could occur from the incremental impact of the construction, operation, and decommissioning of the CISF when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes these other actions. Other past, present, and reasonably foreseeable future actions that will be considered in the cumulative impact assessment include presence of other energy and mineral extraction, other nuclear facilities, and other development projects.

Chapter 6 will include specific environmental mitigation measures proposed by ISP, which may include programs, procedures, and controls for monitoring, measuring, and documenting specific goals or targets that are subject to Federal, State, and local agencies' review and approval.

Chapter 7 will include ISP's proposed environmental measurements and monitoring programs that it will use to demonstrate compliance with regulations in 10 CFR Part 20 and 10 CFR Part 72 regarding radiological effluent release limits, public and occupational dose limits, and reporting. Information regarding program-specific or discretionary monitoring also will be included.

Chapter 8 will describe the societal costs and benefits associated with the proposed action and the No-Action alternative. The purpose of the cost-benefit analysis is not to exhaustively identify and quantify all of the potential costs and benefits, but to disclose major quantitative and qualitative cost factors. The evaluation will, in general, consider major costs associated with construction, operation, and decommissioning of the proposed CISF during the 40-year license term of the proposed facility evaluated in the EIS.

Chapter 9 will include a summary of environmental consequences, including a comparison of environmental impacts, unavoidable adverse environmental impacts, irreversible and irretrievable commitments of resources, the relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity, and the NRC's conclusions and recommendations.

Chapters 10 and 11 will list preparers of the EIS and the distribution list of agencies and organizations that received a copy of the EIS, respectively. Chapter 12 will include references used in the EIS, and Chapter 13 will be a document index. The EIS will also include technical appendices to support the conclusions in the main body of the report and information about correspondence with other agencies.

A.9 Issues Outside the Scope of the ISP CISF EIS

The ISP CISF EIS will evaluate the environmental impacts of construction, operation, and decommissioning of a CISF for SNF to be located in Andrews County, Texas. Certain topics will not be addressed in the EIS, because they are not within the scope of the environmental review. As noted previously, responses to comments on these topics discuss why these topics are outside the scope of the ISP CISF EIS, where practicable. These topics include (but are not limited to)

- consideration of noncommercial SNF (e.g., foreign wastes)
- concerns about nuclear power and alternatives to nuclear power

- consideration of environmental impacts of constructing and operating reprocessing facilities for commercial SNF
- concerns associated with the Yucca Mountain licensing proceeding and national progress in developing a permanent repository
- legacy issues from prior nuclear activities not in the vicinity of the proposed project
- site-specific issues at other nuclear and non-nuclear facilities

Some scoping comments suggested that the NRC should require the implementation of HOSS as an alternative to the proposed action. This alternative is not being analyzed in detail because it does not meet the purpose and need of the proposed action (construction and operation of a CISF).

A.10 Consultation Requirements and Cooperating Agencies

The NRC recognizes there are specific government-to-government consultation responsibilities regarding interactions with Federally-recognized Tribal governments because of their status as sovereign nations. As such, the NRC offers Federally-recognized Tribes the opportunity for government-to-government consultation consistent with the principles in its Tribal Policy Statement, which was issued on January 9, 2017 (82 FR 2402). The Tribal Policy Statement promotes effective government-to-government interactions with American Indian and Alaska Native Tribes and encourages and facilitates Tribal involvement in the areas over which the NRC has jurisdiction. The NRC staff is conducting outreach to Federally-recognized American Indian Tribes with a connection to the area that includes the CISF site in Andrews County, Texas. Seven Tribes were contacted: (i) Apache Tribe of Oklahoma, (ii) Comanche Nation, (iii) Kiowa Tribe of Oklahoma, (iv) Mescalero Apache Tribe, (v) Ysleta del Sur Pueblo, (vi) Tonkawa Tribe of Oklahoma, and (vii) Wichita and Affiliated Tribes. The NRC staff also contacted two Tribes recognized by the State of Texas: (i) Lipan Apache Tribe of Texas and (ii) Texas Band of Yaqui Indians. Consistent with the NRC's Tribal Policy Statement, the NRC may, at the request of Tribal governments, participate in government-to-government meetings to discuss the development of the ISP CISF EIS. The EIS will include an appendix that contains correspondence related to NRC's outreach with American Indian Tribes. The NRC encourages interested American Indian Tribes to participate throughout the ISP CISF environmental review. The NRC will continue outreach efforts with American Indian Tribes throughout the course of this environmental review.

The NRC has not identified any cooperating agency, as defined by 40 CFR 1508.5, for participation in the development of the EIS.

A.11 Future Opportunities for Public Participation

In the upcoming year, the NRC expects to issue a draft EIS for public comment. The comment period on the EIS offers the next opportunity for interested Federal, State, and local government agencies; Tribal governments; local organizations; advocacy groups; environmental organizations; and members of the public to comment on the NRC's ISP CISF environmental review. The NRC staff will consider comments received on the draft EIS in the preparation of the final EIS. Comments received on the draft EIS and responses to those comments (noting any edits and changes to the EIS as a result of comments), will be published with the final EIS.

B Summary of Comments Received During the Public Scoping Period

B.1 Comments Concerning NEPA Process

B.1.1 NEPA Process – Process and Requirements

The NRC staff received comments concerning NEPA requirements and the NEPA process for the evaluation of the proposed CISF. Commenters requested that the environmental review required by NEPA result in a full and rigorous evaluation of the proposed CISF application. Several commenters expressed that the environmental review should thoroughly evaluate the proposed technology for SNF storage as it relates to the suitability of the proposed CISF. One commenter stated that the ISP and the Holtec CISF proposals should be one proposal under NEPA. Another commenter stated that the EIS should evaluate impacts of the CISF on the citizens of Andrews County and the environment. Some commenters stated that communities and organizations should be given an opportunity to review the pertinent documents and be able to establish standing in any proceeding.

Commenters stated that the EIS should have a thorough discussion of alternatives, mitigation measures, inspection processes, and environmental consequences, as required by NEPA. Other commenters noted important environmental issues and resource areas to analyze in detail including: transportation, socioeconomics, cultural resources, geology, hydrogeology, meteorology, and extreme weather events. One commenter stated that the EIS should not rely on outdated studies, data, and information but must reflect current information and conditions. Other commenters noted that the EIS should fully consider all dangers and risks from SNF transport and storage. One commenter stated that the EIS should consider regional and local economic effects of removal of SNF and the environmental, health, and safety hazards associated with transferring SNF from dry casks and loading onto trucks. Another commenter stated that the EIS should provide an analysis of impacts on waste containers from high temperatures, salty dry climate, potential flash floods, lightning, burrowing animals, blocked vents, wind, fire, seismic activity, and climate change. One commenter noted that WCS had set up a website (www.wcsstorage.com) that posts all communication between WCS and NRC. One commenter expressed concerns about NRC's NEPA process and stated that they had yet to see an NRC-issued EIS that fully complies with the Council on Environmental Quality (CEQ's) guidance for NEPA consideration.

Response: The EIS will be prepared in accordance with NRC's applicable NEPA-implementing regulations in 10 CFR Part 51 and associated NRC guidance in NUREG-1748. NEPA mandates that Federal agencies carefully consider the environmental impacts of their actions prior to making decisions that affect the environment. As addressed in 10 CFR 51.10(a), the NRC voluntarily takes account of the CEQ's regulations.

In preparing the EIS, the NRC staff will make use of the best available information to inform its evaluation of potential environmental impacts, and pursuant to 10 CFR 51.41, the staff will independently evaluate and be responsible for the reliability of any information which it uses. As a result, the EIS will present a detailed and thorough description of each affected resource for the evaluation of potential impacts to the environment. Environmental resources that will be evaluated for potential impacts will include land use, transportation, geology and soils, surface and groundwater, threatened and endangered species, air quality, socioeconomics, historic and cultural resources, and public and occupational health. In addition, environmental justice issues; and economic, technical, and other benefits and costs of the proposed action will be considered in the EIS. The EIS will also present a detailed and thorough description of the

No-Action alternative and mitigation measures that will be implemented to avoid or minimize adverse impacts.

The NRC has a longstanding practice of conducting its regulatory responsibilities in an open and transparent manner to keep the public informed of the agency's regulatory, licensing, and oversight activities and to involve stakeholders in the regulatory process. In part, it does so by making information available to the public through the NRC's public Web site (www.nrc.gov) and its online public document system (the Agencywide Documents Access and Management System (ADAMS; accessible at <https://www.nrc.gov/reading-rm/adams.html>). The NRC made WCS's application and ISP's revised application available to the public in ADAMS (docket number 72-1050) and on a project-specific website <https://www.nrc.gov/waste/spent-fuel-storage/cis/waste-control-specialist.html>. The NRC also provided paper copies of WCS's application to public libraries in Andrews, Texas, in Hobbs, New Mexico, and in Eunice, New Mexico.

As regards the NRC's hearing process and standing in those proceedings, the NRC conducts hearings in accordance with the Agency Rules of Practice and Procedure established in 10 CFR Part 2 of NRC's regulations. The NRC's requirements for standing are provided in 10 CFR 2.309.

The staff's Safety Evaluation Report will address the requirements for storage of the spent nuclear fuel in the CISF. For additional comments and responses concerning safety and storage, see Section B.26 [Comments Concerning Safety].

Comments: (1-5-2) (1-7-7) (2-30-1) (3-9-5) (3-10-5) (3-26-2) (3-26-4) (3-33-2) (4-5-1) (5-2) (6-4) (35-2) (38-2) (38-7) (40-1) (40-10) (62-2) (105-2) (112-4) (118-6) (118-18) (139-24) (146-6) (149-7) (149-9) (160-2) (165-4) (165-31) (165-34) (169-4) (170-2) (178-2) (201-1) (220-3) (220-5) (225-4) (235-1) (239-1) (249-1) (261-2) (272-2) (275-1) (392-1) (401-1) (434-6) (447-2) (476-1) (511-19) (539-4) (551-2) (554-13) (556-3) (566-10) (605-1) (673-4) (695-3)

B.1.2 NEPA Process – Scoping Process

The NRC staff received comments about the scoping process for the proposed ISP CISF. One commenter stated that scoping for the proposed CISF should include consideration of unique and unprecedented modeling for severe accident scenarios and cost-benefit mitigation alternatives. One commenter welcomed the scrutiny of the NRC and encouraged NRC to visit the site whenever needed. Another commenter looked forward to the publication of responses to comments made at the scoping meetings. Another commenter expected comprehensive answers in the EIS to the issues raised during the scoping process. Finally, a commenter stated that scoping should include a discussion of the responsibilities of the two national nuclear agencies to ensure that interim storage of SNF is safe for the public now and in the future.

Response: The NRC staff strives to conduct its regulatory responsibilities, including the scoping process, in an open and transparent manner, consistent with the NRC Approach to Open Government (<https://www.nrc.gov/public-involve/open.html>). The NRC requirements for scoping are found at 10 CFR 51.26-51.29 and are further explained in NUREG-1748, Section 4.2.3 (NRC, 2003). The objectives of the scoping process include: (i) defining the scope of the proposed action that is to be the subject of the EIS, (ii) determining the scope of the EIS and identifying alternatives and significant issues to be analyzed in depth, and (iii) identifying and eliminating from detailed study issues that are peripheral or are not significant. To this end, the NRC strives to give equal time to all participants in the scoping

process to present their comments and views at public meetings. In accordance with these outcomes of scoping, the NRC has developed and published this scoping summary report to define issues that are within and outside the scope of the EIS. Next, in accordance with the determinations and conclusions reached during the scoping process, the NRC will develop an EIS for public comment that will evaluate the potential environmental impacts of the CISF.

Comments: (3-6-2) (3-10-2) (4-24-3) (139-8) (344-1) (819-49)

B.1.3 NEPA Process – Requests to Extend the Public Comment Period

The NRC received many comments requesting an extension to the public comment period for scoping. Some commenters noted that additional time was needed in order for the information to be reviewed by the public or so that additional distribution of information could occur to communities along transportation routes. Many of the commenters also requested that additional public meetings be held. Some commenters included requests for translation in their comments.

Response: In the November 14, 2016 FRN announcing NRC's intent to prepare an EIS, conduct scoping, and requesting public comment (81 FR 79531), the NRC opened the public comment period, and in response to requests, subsequently extended the scoping comment deadline until April 28, 2017 (82 FR 14039). The NRC issued an FRN on September 4, 2018, announcing re-opening of scoping for an additional 45 days (83 FR 44922), which was later extended to close on November 19, 2019 (83 FR 53115). Thus, a total of 243 days was provided for the public to submit scoping comments to NRC. Given that NRC staff guidance in NUREG-1748, "Environmental Review Guidance for Licensing Actions Associated with NMSS Programs" (NRC, 2003) recommends a minimum 45-day scoping comment period, the NRC determined that 243 days constituted ample time for comments to be prepared and submitted to the NRC.

For both scoping periods, the NRC staff notified communities local to the proposed project by print media, radio, and e-mail of the scoping comment opportunities, as well as posting on the NRC's website and in the *Federal Register*, such that the information was accessible nationwide. Comments were accepted through a variety of means (e-mail, letter, www.regulations.gov, and at public meetings) in order to provide several avenues through which members of the public in any location could provide information to the NRC. In addition, the NRC will provide a public comment period on the draft EIS when it is published and will announce that public comment period through the *Federal Register* and other means.

Regarding the comments that requested additional public meetings and translation, these comments are addressed in Section B.2 [NEPA Process – Public Participation].

Comments: (2-11-5) (3-22-1) (3-23-2) (3-26-1) (3-31-3) (3-32-1) (5-3) (5-7) (6-3) (27-7) (30-20) (40-3) (118-19) (121-1) (220-6) (220-24) (339-1) (407-5) (434-5) (447-1) (502-18) (511-6) (523-5) (546-6) (551-1) (554-1) (554-12) (598-7) (620-5) (816-4)

B.1.4 NEPA Process – Other Agency Permits

The NRC staff received comments that pointed out that other permits and authorizations would be needed for the proposed CISF from agencies other than NRC. One commenter stated that the EIS must identify all relevant local, State, Tribal, and Federal statutes, regulations, and requirements that apply to the proposed project. Other commenters noted that the EIS must

examine the role of agencies such as Homeland Security, U.S. Department of Defense (DOD), Interstate Commerce Commission, and U.S. Department of Transportation (DOT) in licensing and determine the NEPA obligations of these agencies. One commenter stated that the existing WCS disposal facility is one of the most regulated businesses in the area, with licenses and permits from the Texas Commission of Environmental Quality (TCEQ), NRC, and EPA.

Response: The EIS will identify and describe other Federal, State, and local permits, licenses, approvals, and other entitlements that must be obtained in connection with the proposed CISF. In accordance with NRC staff guidance in NUREG–1748, “Environmental Review Guidance for Licensing Actions Associated with NMSS Programs,” the EIS will include: (i) determination of the status of authorizations (e.g., permits and approvals); (ii) identification of environmental concerns; and (iii) identification of potential administrative problems that could delay or prevent agency authorization (NRC, 2003).

Comments: (1-5-4) (1-17-4) (1-38-1) (2-13-4) (3-9-2) (4-12-5) (4-24-4) (139-23) (163-4) (165-9) (165-16) (511-12) (737-2)

B.1.5 NEPA Process – Lack of Transparency (Redacted Information)

The NRC staff received comments about the lack of transparency in the NEPA process for the proposed CISF. One commenter inquired about the staff’s Safety Evaluation Report timeline and asked that it be prepared jointly with the U.S. Department of Energy. Another commenter expressed concerns about redacted information in the license application documents (i.e., the ER and SAR) and requested that WCS provide un-redacted, non-proprietary versions for public review. Another comment sought contract information about un-announced inspections by federal, state, and local governments.

Response: The NRC has a longstanding practice of conducting its regulatory responsibilities in an open and transparent manner to keep the public informed of the agency’s regulatory, licensing, and oversight activities and to involve stakeholders in the regulatory process. Since its creation in 1975, the NRC has viewed openness as a critical element for achieving the agency’s mission to regulate the Nation’s civilian use of radioactive materials and thereby protect people and the environment.

Making information available to the public is one of the NRC’s key means for assuring openness. The main channels of information used by the NRC include its public Web site (www.nrc.gov) and its online public document system (the Agencywide Documents Access and Management System (ADAMS; accessible at <https://www.nrc.gov/reading-rm/adams.html>)). It is NRC policy to make non-sensitive documents public unless there is a specific reason not to do so.

However, the NRC does protect sensitive unclassified non-safeguards information (SUNSI) related to programs for the physical protection and safeguarding of nuclear materials or facilities to ensure that such information is protected against unauthorized disclosure. The requirements for exempting SUNSI information from public disclosure are specified in 10 CFR 2.390. Some information may be withheld from public disclosure under Section 304 of the NHPA. Information regarding the location and character of potentially eligible historic properties is withheld in order to protect those resources.

Comments: (139-10) (165-2) (412-17) (577-2)

B.1.6 NEPA Process – Inadequate Information and/or Analysis in the License Application

The NRC staff received comments that expressed concern that the license application has missing, misleading, inaccurate, and inadequate information and analyses. Commenters stated that the ER contains inadequate and incomplete information and analyses with regard to issues, resource areas, and required programs and plans including: (i) transportation routes, (ii) social concerns, (iii) security and terrorism, (iv) contamination of food and water, (v) water resources, (vi) geology, (vii) quality assurance, (viii) accidents and cleanup plans, (ix) human exposure from both accidents and normal operations, (x) types of canisters and monitoring systems, (xi) decommissioning and financial assurance, (xii) location of electric lines and estimates of electric use, and (xiii) transfer of fuel from damaged canisters.

Response: In developing the EIS for the proposed CISF, the NRC staff will review and evaluate information and analyses provided in the applicant's license application and supplemental documentation. In addition, the NRC staff will independently collect and review additional information related to the proposed CISF project and its environs. If the NRC staff determines that the information provided in the applicant's license application is not sufficient (e.g., missing or inaccurate) or cannot be independently gathered to allow completion of the EIS, the staff will submit requests for additional information (RAIs) to the applicant to request the information. As needed, the NRC staff will request an updated and revised ER and SAR, and these revised documents will be made publicly available, as appropriate.

Comments: (3-31-2) (4-3-3) (4-4-1) (4-4-3) (4-4-4) (134-5) (134-8) (134-11) (134-16) (134-17) (134-21) (134-23) (138-2) (139-2) (139-14) (165-1) (165-3) (165-5) (174-1) (408-24) (460-1) (460-4) (491-10) (517-1) (517-15) (517-16) (518-10) (518-11) (518-12) (518-14) (523-13) (527-7) (527-13) (539-8) (545-9) (570-5) (570-6) (598-4) (599-1) (599-2) (819-47)

B.2 Comments Concerning NEPA Process – Public Participation

B.2.1 NEPA Process: Public Participation – Requests for More Public Meetings

The NRC received many comments requesting additional public scoping meetings or suggesting locations for additional public scoping meetings. Many of the comments requested public meetings along transportation routes or near sites from which the SNF could be shipped. Some commenters referenced the number and locations of meetings held by the U.S. Department of Energy (DOE) or for the proposed Yucca Mountain repository. Some of the comments also requested that the public comment period be extended. Some comments noted that additional public meetings were not held once the license application review was re-opened.

Response: In a January 30, 2017 FRN, the NRC staff announced the dates, times, and locations for two public comment meetings that the staff would host as part of its scoping process for the environmental review of the ISP license application (82 FR 8771). These meetings were held in Hobbs, New Mexico, on February 13, 2017, and in Andrews, Texas on February 15, 2017. The NRC staff also hosted two webcast-based public comment meetings held in Rockville, Maryland on February 23, 2017 and April 6, 2017. In preparation for these meetings, the NRC issued a press release and made information related to the license application review available to communities local to the proposed project, as well as on the NRC's website, such that the information was accessible nationwide.

The NRC is committed to ensuring an open and transparent process that allows for ample public participation. Operating within resource limitations, the NRC chose the locations of the public meetings to be as accessible as possible to communities local to the project and to State representatives and Tribal communities near the proposed location. In addition to the Texas- and New Mexico-based meetings, the NRC held two webcast meetings that were accessible to participants located throughout the country, including along transportation routes. Furthermore, scoping comments were accepted through a variety of means (e-mail, letter, www.regulations.gov, and at public meetings) to provide several avenues through which members of the public in any location could provide information to NRC. Because of these avenues for providing input, and because NRC considers all comments regardless of whether they are provided in person or in writing, the NRC determined that additional scoping meetings for the re-opened scoping period were not necessary. The NRC will also provide an additional public comment period and public meetings on the draft EIS when it is published and will announce that public comment period through the FRN and other means. The NRC finds that all these activities have provided sufficient and appropriate opportunity for the public to provide input to the scoping process.

The comments requesting an extension to the public comment period are addressed in Section B.1.3 [NEPA Process – Requests to Extend the Public Comment Period]. Comments regarding consultation are addressed in Section B.3.1 [NEPA Process: Section 106 – Consultation under NHPA Section 106].

Although the NRC will consider the requests expressed in these comments while determining the location and number of public meetings for the draft EIS, these comments will not be addressed further in the EIS.

Comments: (1-15-6) (1-20-6) (1-22-6) (2-10-7) (2-11-6) (2-11-8) (2-18-7) (2-22-7) (3-10-1) (3-17-5) (4-14-1) (4-21-1) (4-21-3) (4-26-1) (27-5) (50-5) (98-11) (99-19) (124-4) (140-10) (140-12) (165-14) (171-11) (174-10) (400-2) (412-19) (415-5) (419-1) (436-6) (448-4) (460-15) (463-4) (469-4) (473-2) (491-5) (509-2) (511-22) (520-2) (536-1) (539-3) (540-5) (540-6) (540-7) (545-5) (545-19) (546-2) (552-5) (559-20) (567-1) (580-6) (580-7) (620-3) (645-5) (673-2) (816-2) (819-43)

B.2.2 NEPA Process: Public Participation – Inclusiveness in NRC Public Meetings

Several comments discussed inclusiveness in the NRC's public meeting process. Some comments included statements about feelings of fear or intimidation about participating. Others noted that those participating were not from the local area.

Response: The NRC staff holds public scoping meetings to elicit comments from the public. Although the NRC makes efforts to hold public meetings in the geographic vicinity of proposed projects, all members of the public are invited to provide comments. The NRC staff has specific procedures for maintaining an open and safe atmosphere in which the public can provide comments and the agency can respectfully listen and receive those comments. Recognizing that opinions among participants may be very strong and can vary widely, the NRC staff strives to maintain order in meetings (e.g., minimize disruptions) while allowing freedom of expression.

The NRC staff process is designed to allow all of those who wish to speak that opportunity by allotting approximately equal speaking time to each speaker. Nonetheless, if individuals have additional comments beyond what the allotted time allows, supplementary comments can be submitted via electronic or U.S. postal mail. The NRC staff will continue to take public

recommendations regarding its meeting processes under advisement and make adjustments for future meetings, as practicable.

Comments: (2-17-5) (4-21-2) (23-5) (34-3) (104-4)

B.2.3 NEPA Process: Public Participation – NRC Responsiveness to Comments

Commenters expressed various concerns about NRC consideration of public input. Some commenters encouraged others at the public meetings to provide comments to the NRC. Others stated that there had not been adequate opportunities to provide comments. One commenter stated that the members of the public are underfunded to bring forward their concerns for adequate consideration in the process. A few comments included requests for additional public meetings and distribution of information. Some commenters inquired about how and whether NRC will consider comments provided during the scoping process.

Response: The NRC staff conducts the scoping process to elicit information from various stakeholders, including members of the public, regarding what should be included in the EIS. Whether comments are received at public meetings, through e-mail, www.regulations.gov, or U.S. mail, each submittal is tracked through the NRC's ADAMS system. The NRC does not routinely provide funds to organizations or individuals to participate in scoping processes; however, comments may be submitted at no cost by any member of the public, and all comments are carefully considered.

At this time, no licensing decision has been reached. Based on the NRC staff's evaluation of the license application materials, supporting documentation, independent assessments, and input received during the scoping process, the NRC staff will issue a draft EIS with its preliminary conclusions regarding the potential environmental impacts of the proposed project. Stakeholders (including members of the public) will be afforded an opportunity to comment on the draft EIS prior to publication of a final EIS. The culmination of the safety review, environmental review, and adjudicatory process will be a determination by NRC on whether to grant the license to ISP to construct and operate the proposed CISF. Comments regarding distribution of information are in Section B.1.6 of this report and comments regarding holding additional public meetings are located in Section B.2.1 of this report.

Comments: (2-26-1) (2-26-2) (3-9-3) (3-28-1) (4-1-4) (4-1-5) (278-1) (321-3) (414-2) (460-19) (540-3) (547-1) (598-5) (814-1)

B.2.4 NEPA Process: Public Participation – WCS Site Visits by Private Citizens

One commenter expressed frustration that, in the past, community group members from New Mexico were prohibited from visiting the WCS facility. Another commenter referred to the openness of the WCS facility for visits.

Response: Private companies have safety and security policies regarding site visitors and set their own policies with respect to private citizens visiting their facilities. The NRC staff does not have specific regulatory authority over WCS/ISP's policy regarding these visits or their offer in the public comment to allow visits. Because the comments do not provide additional information about the scope of the EIS, they will not be considered further in the EIS.

Comments: (4-18-5) (558-10)

B.2.5 NEPA Process: Public Participation – Accessibility and Request for Increased Distribution of NRC Information

The NRC received comments stating that information about the license application or about the NRC's public meetings was difficult to access or inadequate. Some commenters stated that the NRC or ISP should make information more available, increase distribution of the information (including to those along transportation routes), and provide more time for review of the information, because not enough people participate in the process or knew about the public meetings. One commenter requested that information regarding discussions with WCS be made public.

Response: The NRC strives to conduct its regulatory activities in an open and transparent way and to make information as accessible as possible. As discussed in Section A.2 of this report, the NRC determined that the 243-day comment period provided ample time for public input. For this scoping process, the NRC published FRNs and press releases, posted information to the NRC website, and sent copies of materials to libraries closest to the proposed CISF site. Advertisements were placed with local radio stations and newspapers to notify the public of the meetings. The information available on the NRC's website is available nationwide, including to those along transportation routes. This information includes records of pre-licensing interactions between NRC and the applicant; the license application; and materials that NRC used in its public meetings, including summaries of the project and how to comment on the scope of the EIS. As the license application review progresses, interactions with the applicant will be made public through inclusion of documents in the NRC's ADAMS library, links on the NRC website, or meetings that are open to the public, consistent with the NRC's public meeting policies.

The NRC directly engages with stakeholders regarding its regulatory review process during the environmental review process. All stakeholders, including government representatives, Tribal members, and members of the public, were encouraged to attend and participate in the environmental scoping process.

Comments: (1-14-5) (1-20-4) (2-31-3) (3-25-1) (4-4-7) (4-20-1) (4-24-2) (4-26-3) (4-26-5) (9-1) (9-3) (108-10) (139-27) (412-18) (643-1) (683-2) (694-1) (786-1) (815-3) (815-6)

B.2.6 NEPA Process: Public Participation – Concern about Violation of Meeting Notice Policy

One commenter stated an objection that NRC violated its own public notice period.

Response: The NRC acknowledges that the meeting notice announcing the public teleconference meeting during which the commenter spoke (February 23, 2017) did not meet the typical 10-days' notice standard, due to an administrative error. This was acknowledged by the NRC staff, and, as stated during the meeting, the staff determined that it was more beneficial to hold, rather than cancel, the meeting. The NRC had announced in the January 30, 2017, Federal Register Notice (82 FR 8771), its intention to hold such a meeting, and in the two preceding public scoping meetings, on February 13 and 15, 2017, had stated that another scoping comment meeting would be held on February 23, 2017. 70 people attended the February 23rd meeting, either in person or by telephone (NRC, 2017).

As discussed further in the introductory sections of this document, in total, the NRC staff held four public scoping comment meetings and provided multiple avenues through which members

of the public in the proposed site vicinity and from across the country could provide public comments over a total 243-day comment period. Given that the NRC's NEPA-implementing guidelines in NUREG-1748 recommend a minimum 45-day scoping comment period, the NRC determined that 243 days constituted ample time for comments to be prepared and submitted to the NRC.

Comments: (3-20-4)

B.2.7 NEPA Process: Public Participation – Consent-Based Siting

The NRC staff received many comments about consent-based siting and whether the ISP licensing decision should or will be decided based on consent. Several of the commenters stated lack of local community consent or objected to assertions that the local community does consent. Many comments requested that the decision be democratic or brought to a vote. Some comments referenced the Blue Ribbon Commission report that recommended consent-based siting. Other comments requested more public meetings to determine consent near the site or along transportation routes.

Response: The NRC's licensing framework is not a consent-based process; therefore, consent-based siting and requests for such are beyond the scope of the EIS. The Atomic Energy Act of 1954 requires that the NRC establish criteria for the licensing of nuclear facilities, including spent nuclear material storage facilities. Absent Congressional direction to do so, the NRC may not deny a license application for failure to conduct consent-based siting. Although the NRC licensing process offers multiple opportunities for public involvement, including an opportunity for public comment on the EIS scoping process and the draft EIS, for the reasons stated above, this process does not include provisions for local consent prior to NRC granting a license.

The Blue Ribbon Commission report, published in 2012 through the Secretary of Energy, recommended a consent-based siting approach for new facilities for the management and disposal of nuclear waste. The DOE was tasked to implement the recommendations in the report. However, because the proposed CISF would be licensed by the NRC, and the NRC process for licensing is not consent-based, neither the assertions of consent by ISP in its license application nor the statements of consent or non-consent in the comments will be evaluated further in the EIS.

Comments: (1-1-3) (1-2-5) (1-14-4) (1-18-3) (1-18-5) (1-22-4) (1-23-1) (2-8-9) (2-10-8) (2-29-5) (3-9-6) (3-16-7) (3-17-6) (4-1-3) (14-3) (35-3) (38-8) (40-11) (88-3) (101-9) (108-12) (130-4) (146-9) (148-2) (170-4) (201-2) (220-25) (317-2) (347-1) (436-3) (454-2) (491-2) (491-4) (508-4) (527-4) (531-1) (540-4) (545-16) (557-6) (558-2) (566-1) (566-17) (571-15) (571-16) (589-8) (620-4) (645-4) (645-10) (655-2) (664-1) (761-1) (783-3) (801-1)

B.2.8 NEPA Process: Public Participation – Requests for Foreign Language Translations

The NRC received several comments requesting that project information be made available in Spanish. Some comments requested that public meetings be held in Spanish or with Spanish translation.

Response: Regarding the use of Spanish and other languages during the environmental review process, the NRC does not require applicants to provide license application documents

in languages other than English but does implement the NRC's Limited English Proficiency Plan for activities associated with review of the ISP application. The NRC staff did not limit the public from providing comments in other languages. Two fluent Spanish-speaking NRC staff members were present at each of the scoping meetings and were pointed out to the audience during each meeting. The NRC public meeting notices were issued in English and in Spanish in local newspapers. At each scoping meeting, the NRC staff provided presentation slides, a fact sheet about the project, and information about how to comment on the project in Spanish. Those materials are available on the NRC website at this link: <https://www.nrc.gov/waste/spent-fuel-storage/cis/wcs/public-meetings.html>.

The scope of the EIS with respect to environmental justice concerns is addressed in Section B.19 [Comments Concerning Environmental Justice] of this report. More information about public participation is discussed in Section B.2 [Comments Concerning NEPA Process – Public Participation] of this report.

Comments: (6-2) (53-2) (149-6) (434-4) (467-3) (511-5) (511-23) (518-15) (518-16) (528-2) (539-2) (796-3)

B.2.9 NEPA Process: Public Participation – Support for NRC Efforts

One commenter expressed appreciation or support for the NRC's public participation and outreach efforts related to the scoping process and appreciation for participation by local entities.

Response: The NRC acknowledges the comment supporting the public participation opportunities. The NRC strives to conduct effective, open, and transparent public engagement.

Comments: (512-3)

B.2.10 NEPA Process: Public Participation – NRC Process for Safety Evaluation and Hearings

One commenter requested that NRC accept oral comments on the technical and legal aspects of the application. Another commenter requested changes to the legal hearings procedure. One commenter stated that the Safety Evaluation Report (SER) should be made available before the draft EIS.

Response: The NRC operates its license review process according to a well-established regulatory framework, which includes a safety review, an environmental review, and in many cases, opportunity for adjudicatory hearings. During the safety review process, the NRC staff holds meetings with the applicant to discuss the review of the application. The results of the staff's safety review are available to the public, and many of these meetings are open to the public. Information about public meetings related to this project are posted on the NRC's website at <https://www.nrc.gov/waste/spent-fuel-storage/cis/wcs/public-meetings.html>. The NRC staff publishes the results of its safety review in a publicly available SER. This scoping process is part of the environmental review, during which the NRC elicits comments from interested parties and the public on the scope of the environmental review (including the applicant's documents) and will again seek comment on the draft EIS, when published. For this and many other licensing proceedings, the NRC publishes a notice of opportunity for hearings. Hearings are conducted in accordance with the Agency Rules of Practice and Procedure established in 10 CFR Part 2 of NRC's regulations. The NRC's hearing process provides for

resolution of disputes associated with license applications submitted to the NRC. Administrative judges from the NRC's Atomic Safety and Licensing Board Panel (ASLBP) generally conduct these hearings. During the opportunity for hearing for this proposed project, challenges addressing safety and environmental issues could be filed by individuals and organizations for adjudication by ASLBP judges.

Because the comments do not offer new information on the scope of the EIS, they will not be addressed further in the EIS. Comments regarding changes to the NRC's licensing or hearing process are outside the scope of this environmental review.

Comments: (3-14-2) (3-14-3) (3-31-4) (139-11)

B.3 Comments Concerning NEPA Process – NHPA Section 106 Consultation

B.3.1 NEPA Process: Section 106 – Consultation under NHPA Section 106

The NRC staff received comments regarding the consultation that will or should occur with American Indian Tribes. These commenters encouraged NRC to follow applicable executive orders and Federal regulations and to conduct government-to-government consultations with Tribes. One commenter stated that Tribal Nations along transportation routes should be included in the consultation process.

Response: Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," (65 FR 67249) reaffirmed the Federal government's commitment to a government-to-government relationship with American Indian Tribes and directed Federal agencies to establish procedures to consult and collaborate with Tribal governments when new agency regulations would have Tribal implications. The Order excludes "independent regulatory agencies, as defined in 44 U.S.C § 3502 (5)," from the requirements of the Order. However, according to Section 8, "Independent regulatory agencies are encouraged to comply with the provisions of this order." Although the NRC, as an independent regulatory agency, is explicitly exempt from the Order, the Commission remains committed to its spirit. In 2017, the NRC issued a Tribal Policy Statement (82 FR 2402), which established principles to be followed by the NRC government-to-government interactions with American Indian and Alaska Native Tribes, and to encourage and facilitate Tribal involvement in the areas over which the Commission has jurisdiction.

The NRC staff will initiate discussions with potentially affected Tribes that possess potential religious, spiritual, and cultural interest and ties to the proposed CISF project area when complying with the NHPA Section 106 regulatory requirements during the draft EIS process for this project. Consultation with the Texas Historical Commission and New Mexico State Historic Preservation Office (SHPO) will be necessary to determine the need for cultural resources investigations (including archaeological and architectural surveys) to (i) identify cultural resources within the area of potential effects (APE) prior to any onsite ground-disturbing activities, (ii) determine whether any identified cultural resources are eligible for inclusion in the National Register of Historic Places (NRHP), (iii) evaluate the potential impacts on cultural resources and/or historic properties, and (iv) determine the effect of the proposed project pursuant to Section 106 of the NHPA. The applicant would be part of the Section 106 consultation process and, accordingly, would participate in discussions to develop and implement measures to protect discoveries in the event that cultural resources are found during building or operation of the proposed CISF. The EIS will describe the consultation activities conducted for the proposed project, and NRC staff will make available public documents related

to consultation activities as appropriate consistent with Section 304 of the NHPA. The Historic and Cultural Resources Section of the environmental impacts assessment chapter will describe the potential impacts and mitigation to any identified historic and cultural resources.

In addition, through the Tribal Advance Notification program (77 FR 34194), American Indian Tribes that choose to receive advance notification of shipments of irradiated reactor fuel and certain nuclear wastes passing across their reservation are informed by the licensees in advance. Additional information about the NRC's Tribal Advance Notification program is available on the NRC's website at <https://www.nrc.gov/about-nrc/state-tribal/tribal-advance-notification.html>.

Comments: (3-23-3) (16-7) (570-14)

B.4 Comments Concerning the Proposed Action

B.4.1 Proposed Action – Details of the Proposed Action

The NRC staff received a number of comments regarding the details of the proposed action. Commenters requested additional detail on the reactor sites from which SNF would come, the amount of SNF to be stored, and the cost of storage and the license term of the proposed CISF. A commenter stated that the proposal would involve a temporary solution, rather than a permanent one. One commenter was concerned about the storage capacity of the site. Another commenter stated that radioactive waste should never be stored above ground. A commenter was concerned about the applicant selling some or all of the waste to make more profit. Another commenter stated that the storage systems for the proposed CISF have proven secure and effective at other storage locations.

Response: The proposed action is NRC's authorization to ISP to construct and operate a CISF for SNF, which provides an option for interim storage of SNF before a permanent repository is available. The EIS will evaluate the impacts of the proposed action and storage capacity of up to 40,000 MTUs of SNF that would be stored in 3,000 canisters for the 40-year license term of the proposed CISF. The SNF would be transported to the proposed CISF from decommissioned nuclear reactor sites and operating reactors in transportation casks licensed by the NRC pursuant to 10 CFR Part 71 and in compliance with requirements established by the DOT. The EIS analysis assumes that the SNF will be transported away from the proposed CISF after the 40-year license term and that decommissioning of the facility would begin.

ISP is seeking a license pursuant to 10 CFR Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste." Typically, facilities licensed under 10 CFR Part 72 store spent nuclear fuel in above-ground dry cask storage systems like those proposed by ISP. If licensed by NRC, ISP would need to keep records of the spent nuclear fuel received and stored at the CISF, consistent with NRC's regulations at 10 CFR 72.72.

Additional discussion regarding the scope of the EIS with respect to the timeframe of the analysis can be found in Section B.6.3 [Assumptions – Timeframe of the Proposed Action]. For additional information on the scope of the Transportation analysis that would be included in the EIS, see Section B.10 [Comments Concerning Transportation of Spent Nuclear Fuel].

Comments: (1-12-2) (1-17-7) (2-13-8) (2-22-2) (2-22-6) (3-12-2) (3-17-1) (12-2) (28-2) (58-2) (139-7) (149-2) (165-13) (165-15) (171-13) (195-1) (333-2) (345-2) (350-1) (408-10) (412-3) (429-3) (469-5) (512-5) (517-4) (557-3) (564-8) (663-4) (784-2)

B.4.2 Proposed Action – De Facto Disposal

The NRC staff received a large number of comments expressing concern that the proposed CISF would not be an interim storage facility but would instead become a *de facto* disposal site. Commenters stated that the facility would become a *de facto* disposal site because there was no intention to move the SNF twice (i.e., once from the generation site and once to the final repository). Some commenters stated concern that licensing the proposed CISF would reduce the need for and likelihood of construction of a permanent repository, or that because there is currently no final permanent repository available, that this interim facility would be a *de facto* disposal site. Some commenters were concerned that once the proposed CISF is licensed, Congress would have little incentive to fund and build a permanent repository. Some commenters were concerned that the interim proposed CISF would not be built to the same standards as a permanent repository should the proposed CISF become a *de facto* disposal site. Commenters stated that the EIS should address the impacts of the proposed CISF becoming permanent by default. Commenters expressed concern about the maintenance of canisters and casks over the timeframe of the proposed project, stating that the timeframe would be indefinite.

Response: The proposed action is to construct and operate a CISF for SNF, providing an option for storage of the spent fuel before a permanent repository is available. The EIS will evaluate the impacts of the proposed action for the license term of the proposed facility, which is 40 years. If the license is approved, the licensee will have the option to apply for a license renewal under 10 CFR 72.42. However, the environmental analysis for the EIS assumes that fuel will be transported away from the CISF and that decommissioning of the CISF would occur at the end of the initial 40-year license period. In accordance with 10 CFR 51.23(b), 51.80(b)(1), and 51.97(a), with respect to analysis of potential environmental impacts of storage beyond the license term of the facility, the impact determinations in the Continued Storage GEIS, NUREG-2157 (NRC, 2014), shall be deemed incorporated into the EIS for the proposed CISF. As explained in the Continued Storage GEIS, consistent with current national policy, disposal in a permanent repository is feasible (see Appendix B of the GEIS). Therefore, evaluation of impacts of SNF disposal or indefinite storage at the proposed CISF are outside the scope of this EIS. Additional discussion regarding the scope of the EIS with respect to safety of canisters and casks and transportation can be found in Section B.26 [Safety] and Sections B.9 and B.10 [Transportation].

Comments: (1-9-3) (1-12-6) (1-13-3) (1-13-4) (1-16-1) (2-5-1) (2-5-3) (2-8-2) (2-8-10) (2-9-1) (2-9-7) (2-10-5) (2-17-2) (2-20-2) (3-5-10) (3-13-7) (3-16-4) (3-24-1) (3-31-5) (4-9-3) (4-14-6) (4-14-8) (21-3) (24-2) (28-12) (28-18) (30-3) (30-19) (38-5) (87-4) (98-9) (99-16) (100-2) (101-3) (111-6) (121-4) (127-2) (127-6) (130-1) (132-2) (134-13) (140-1) (142-5) (146-3) (164-9) (165-8) (165-22) (165-32) (169-3) (171-8) (175-3) (220-20) (277-2) (280-1) (318-4) (335-2) (339-12) (395-3) (406-1) (408-20) (408-22) (421-3) (436-2) (439-2) (443-2) (444-1) (460-11) (461-1) (463 1) (470-5) (476-5) (491-8) (502-2) (502-3) (511-3) (511-21) (517-14) (521-1) (522-9) (523 3) (523-7) (525-3) (525-4) (530-5) (539-6) (545-4) (545-6) (554-11) (556-2) (559-19) (560 7) (570-4) (576-15) (589-1) (598-2) (599-3) (620-13) (645-15) (650-2) (650-4) (663-3) (815 7) (819-2) (819-6) (819-7) (819-15) (819-17)

B.5 Comments Concerning the Purpose and Need of the Proposed Action

B.5.1 Purpose and Need for a CISF

The NRC received comments about the purpose and need for the CISF. Some commenters stated that storage facilities like ISP are needed to provide storage for SNF currently stored at individual sites. Other commenters stated that the proposed CISF would cause thousands of unnecessary SNF waste shipments throughout the U.S. Commenters expressed differing opinions on whether the purpose and need would or would not address the need of long-term storage of SNF. Several commenters stated that construction of a CISF would not solve the issue of SNF disposal. Other commenters noted that there is no need for a CISF and that SNF can be stored safely at reactor sites for as many years as it would remain at a CISF.

Response: Absent findings in the NRC's safety review or NEPA analysis that the proposed facility does not meet regulatory requirements, the NRC has no role in the planning decisions of private entities. An EIS discusses the purpose and need for the proposed action to establish a range of reasonable alternatives, in addition to the proposed action, that can satisfy the underlying need.

Comments: (1-6-1) (1-7-2) (1-11-3) (1-18-7) (2-20-1) (2-28-2) (2-29-2) (3-27-1) (4-25-2) (5-1) (27-1) (30-1) (32-1) (42-1) (63-3) (134-2) (140-9) (146-2) (180-2) (220-4) (400-5) (447-3) (460-3) (461-2) (470-6) (512-1) (517-3) (559-2) (576-14) (645-8)

B.5.2 Purpose and Need – NRC's Continued Storage GEIS and the Proposed CISF

The NRC staff received one comment stating that the ER's purpose and need statement regarding the safety of the proposed CISF compared to the continued storage of SNF at reactors or Independent Spent Fuel Storage Installation (ISFSIs) contradicts the NRC's Continued Storage GEIS.

Response: The NRC regulations in 10 CFR Part 51, Appendix A, require an EIS to include a description of the purpose of, and a discussion of the need for, a proposed action. The NRC staff guidance in NUREG-1748 (NRC, 2003) regarding the preparation of the purpose and need analysis in the applicant's ER and the NRC staff's EIS states that the applicant and the NRC staff treatment of this subject should explain "why the proposed action is needed," going on to indicate that the discussions should describe the underlying need for the proposed action and "should not be written merely as a justification of the proposed action, nor to alter the choice of alternatives." In short, an applicant should describe what will be accomplished as a result of the proposed action.

The applicant's ER states that the proposed CISF would provide temporary storage of SNF for decommissioned shutdown sites in order to return the land to greenfield status; reducing costs related to surveillance, maintenance, emergency preparedness, and physical security at current ISFSIs; and alleviating the need for constructing new ISFSIs. Safe storage at the proposed CISF is only one component of the applicant's stated purpose and need.

Furthermore, the EIS will compare the impacts of the proposed action with the No-Action alternative but will not provide a determination regarding which option is "safer." All NRC licensed sites, both at-reactor ISFSIs and CISFs, are required to be in compliance with NRC's safety, security, and environmental regulations. Similarly, the Continued Storage GEIS, (NUREG-2157) did not perform any qualitative analysis of the safety benefits of at-reactor

versus away-from-reactor consolidated storage, nor did it endorse any particular storage method. Rather, the Continued Storage GEIS analyzed the environmental effects of the continued storage of SNF at both reactor sites and away-from-reactor ISFSIs (NRC, 2014).

Comments: (570-2)

B.6 Comments Concerning Assumptions

B.6.1 Assumptions – Assumptions Regarding NRC’s Continued Storage GEIS

The NRC received comments regarding the applicability of the assumptions in the Continued Storage GEIS to the proposed CISF. Specifically, commenters were concerned about the lack of a DTS and whether the proposed CISF was in contradiction to the Continued Storage GEIS.

Response: The NRC’s Continued Storage GEIS (NUREG–2157) is applicable only for the period of time after the license term of a facility. As described in Chapter 5 of the GEIS, a site-specific review is conducted for the construction and operation of an away-from-reactor storage facility for the period of its license term. For this EIS, the Continued Storage GEIS is incorporated into the EIS by the regulation at 10 CFR 51.23(b) only for the timeframe beyond the initial 40-year license. Regarding a DTS, the applicant has not proposed construction or operation of a DTS in its license application, and one is not anticipated to be needed during the 40-year license. Therefore, discussion of a DTS is outside the scope of this EIS.

Comments: (3-29-7) (28-19) (121-5)

B.6.2 Assumptions – Loss of Institutional Controls at the Proposed CISF

The NRC staff received comments that questioned the reasonableness of effective institutional controls that would continue in the long-term timeframe. A commenter was specifically concerned with the failure of the canisters and casks because the commenter suggested that the proposed CISF would become a *de facto* permanent disposal site and therefore the EIS must consider the loss of institutional controls. One commenter referenced the discussion in the DOE’s Yucca Mountain EIS with respect to the degradation of casks currently stored onsite at nuclear facilities.

Response: The timeframe of analysis for this proposed action is 40 years, over which timeframe institutional controls can be reasonably assumed to remain in place. At the end of the 40-year license timeframe, the licensee would have the option to renew the license, at which time a full environmental and safety review would be conducted. For periods of time beyond the license term of the facility, the Continued Storage GEIS (NUREG–2157) applies. The Continued Storage GEIS addressed the stability of institutional controls over the long-term and indefinite timeframes and discussed the potential impacts of a loss of institutional controls (NRC, 2014). Thus, the NRC has concluded that it is reasonable to assume that licensees will remain responsible for the SNF stored on their sites and that institutional controls and, specifically, continued oversight by the NRC, will remain in place for the duration of the licensing timeframe and any subsequent licensing timeframes.

Regarding DOE’s Yucca Mountain EIS (DOE, 2008), the DOE included an analysis for the loss of institutional controls for storage facilities under the No-Action alternative. The NRC notes that DOE’s proposed action in that instance was the construction of a repository and, as a result, analysis of the No-Action alternative—not constructing a repository—was required by NEPA,

despite it not being considered a reasonably likely scenario. Permanent disposal of spent fuel is a DOE responsibility, and DOE's analysis was designed to evaluate the environmental impacts of not meeting that responsibility. DOE evaluated the storage of the total amount of HLW (i.e., 70,000 MTU) that would be disposed at the repository and, as a means of evaluating what would happen if it took no action, it considered the consequences of a simultaneous loss of institutional controls at 72 commercial and 5 DOE storage sites. While the DOE analysis may have sufficed for DOE's Yucca Mountain EIS and those associated scenarios, the NRC does not believe that the passive scenario assumed as part of the DOE's No-Action alternative provides a meaningful method of analyzing the consequences of storage over the proposed 40-year license timeframe in this EIS.

Additional comments on the scope of the timeframe for the proposed action can be found in Section B.6.3 [Assumptions – Timeframe of the Proposed Action].

Comments: (2-5-4) (3-29-8) (4-17-4) (408-28) (525-5) (532-1) (533-3) (650-5) (722-1) (819-31)

B.6.3 Assumptions – Timeframe of the Proposed Action

The NRC staff received comments regarding the timeframe of the analysis for the proposed action. Several commenters were concerned about the degradation of canisters and casks, and the potential of repacking the SNF over the course of the 40-year license term and beyond. Commenters requested that NRC evaluate the safety and environmental impacts of the proposed CISF over the potential total license term including any license renewals, while others stated that proposed activities should be evaluated for a longer period of time than just the license term. Two commenters were concerned about repackaging the SNF and the lack of a DTS. One commenter was also concerned about the loss of institutional control after the license term ends.

Response: The EIS will evaluate the potential environmental impacts for the 40-year initial license timeframe associated with the proposed action. The NRC safety analysis will evaluate the potential for credible scenarios that would result in radiological release, actions to be taken if transportation packages do not meet acceptance criteria, and storage systems maintenance programs to maintain the important-to-safety design functions.

The NRC's Continued Storage GEIS (NUREG-2157) is applicable for the period of time after the license term of a facility. As described in Chapter 5 of the GEIS, a site-specific review is conducted for the construction and operation of an away-from-reactor storage facility for the period of its license term. Thus, for the proposed 40-year license term for the ISP CISF, the NRC staff's safety review will address credible accidents and associated mitigations. If the NRC staff's safety review determines that these scenarios are credible, information from this review will inform the analysis in the EIS, as appropriate. For this EIS, the Continued Storage GEIS is incorporated into the EIS by the regulation at 10 CFR 51.23(b), only for the timeframe beyond the initial 40-year license. Regarding a DTS, the applicant has not proposed construction or operation of a DTS in its license application, and one is not anticipated to be needed during the 40-year license. Therefore, discussion of a DTS is outside the scope of this EIS. Comments regarding institutional controls are addressed in Section B.6.2 of this report.

Comments: (1-16-2) (1-16-3) (1-16-8) (2-11-2) (3-10-4) (3-30-1) (4-9-4) (4-17-2) (5-6) (45-3) (55-3) (112-2) (157-4) (161-4) (165-28) (220-23) (324-7) (460-18) (560-5) (695-2) (770-1)

B.6.4 Assumptions – Legal Framework of the Proposed CISF

The NRC staff received numerous comments regarding the legality of licensing an interim storage facility. Several commenters noted that under current Federal law (i.e., the Nuclear Waste Policy Act of 1982, as amended), SNF is prohibited from transport and storage at an interim storage facility. One commenter stated that the government, rather than a private company, should administer all nuclear storage after the utilities relinquish control. Another commenter recommended that the NRC amend 10 CFR Part 72 to address any potential differences in personnel resources, equipment, and emergency preparedness.

Response: The NRC has previously licensed a consolidated (away-from-reactor) interim spent fuel storage installation, and NRC regulations allow for licensing private away-from-reactor interim spent fuel installations under 10 CFR Part 72. The NRC allows licensed private transportation of spent fuel. For more information on the NRC's regulation of spent fuel transportation, see <https://www.nrc.gov/waste/spent-fuel-transp.html>. Issues relating to title to spent fuel are primarily outside the scope of this EIS because who holds title will likely not influence the environmental impacts of the proposed action. The comment that the government rather than a private company should administer nuclear storage is a matter of policy and is outside the scope of this EIS.

Comments: (1-18-6) (2-5-2) (2-8-3) (2-31-2) (3-2-3) (3-2-6) (3-12-7) (3-13-6) (3-31-1) (6-1) (28-21) (55-4) (134-12) (139-1) (139-3) (139-26) (160-1) (165-6) (165-30) (415-4) (425-1) (434-3) (436-8) (444-3) (467-1) (502-17) (511-2) (523-6) (525-7) (528-11) (539-23) (540-2) (545-25) (547-2) (549-2) (557-7) (557-9) (634-2) (803-4) (819-5) (819-14)

B.7 Comments Concerning Alternatives

B.7.1 Alternatives – Other

The NRC staff received several comments containing suggestions for alternatives to a consolidated interim storage facility for SNF (the proposed action) to be analyzed in the EIS. The comments included the use of lasers, onsite vitrification, solar and lunar disposal, and reprocessing as suggested methods for disposal or treatment of SNF. One commenter suggested selling SNF to foreign governments. Another commenter suggested different rock types for safe storage.

Response: For the purpose of the NRC environmental review of the proposed action, only alternatives that are considered reasonable or feasible and that would meet the purpose and need will be analyzed in the EIS. While some suggested alternatives are innovative, only those alternatives that are currently available are considered reasonable or feasible. Additional comments related to alternatives that are out of scope are in Section B.30 [Out of Scope]. For information on the scope of the proposed action see Section B.4 [Proposed Action]. Additional comments on alternatives can be found in a separate response within this section of the report.

Comments: (2-14-5) (3-18-1) (4-2-1) (8-1) (13-2) (172-1) (185-2) (187-1) (250-2) (270-2) (412-2) (412-20) (412-21) (449-1) (459-2) (480-2) (534-1) (625-1) (636-1) (689-1) (703-1) (773-1) (813-1)

B.7.2 Alternatives – Proposed Site Location

The NRC staff received comments about the use of alternative sites for the proposed project and for long term or permanent storage of the SNF. Commenters suggested storing SNF at existing licensed and operating ISFSIs, secured military bases, DOE-owned facilities, states other than Texas, or leaving the SNF where it was generated and is currently stored. Several commenters recommended consolidating fuel in areas close to the reactors to minimize transportation and risk. Some commenters suggested moving SNF away from natural hazards. One commenter stated that CEQ guidance required the NRC to evaluate reasonable alternatives including those not proposed by the applicant and those outside the jurisdiction of the NRC. A few commenters suggested modifying and monitoring existing spent fuel pools for SNF storage. One commenter suggested burying the SNF where it is currently located. Another commenter suggested extending the licensed life of current ISFSIs.

Response: The NRC will evaluate the potential environmental impacts of the construction, operation, and decommissioning of the proposed CISF. In the EIS, the No-Action alternative will evaluate the potential impacts of not constructing or operating the proposed CISF and leaving the SNF onsite at current locations as a baseline for comparison against the potential environmental impacts of constructing and operating a CISF. The scope of the EIS, with respect to safety and transportation, is discussed in Sections B.10 and B.26, [Transportation of Spent Nuclear Fuel – Safety/Accidents and Safety], respectively.

Comments: (1-22-7) (2-18-6) (3-7-1) (3-7-4) (3-13-8) (3-15-1) (3-15-2) (3-15-4) (4-4-6) (4-14-5) (4-14-11) (4-23-2) (18-2) (28-23) (31-2) (41-2) (45-8) (54-2) (58-9) (63-4) (71-3) (73-2) (86-3) (100-4) (101-7) (110-3) (115-2) (115-6) (122-3) (142-9) (163-1) (164-12) (165-24) (165-27) (177-1) (192-3) (193-6) (196-1) (203-3) (208-1) (213-3) (217-3) (218-2) (242-1) (247-2) (250-1) (260-1) (266-1) (274-1) (284-5) (286-1) (288-1) (297-1) (318-1) (327-3) (329-3) (338-3) (342-4) (348-1) (365-2) (398-2) (412-8) (412-22) (413-2) (417-1) (418-1) (436-7) (442-1) (442-3) (454-3) (460-9) (466-2) (495-2) (508-5) (511-7) (522-10) (522-11) (550-2) (552-1) (559-4) (562-2) (563-5) (570-19) (571-17) (575-2) (575-4) (576-13) (579-2) (583-1) (586-2) (591-6) (600-1) (648-2) (653-2) (660-2) (662-2) (664-2) (669-5) (691-1) (704-2) (706-2) (766-2) (771-1) (775-2) (777-1) (779-4) (780-5) (784-1) (797-3) (803-2) (805-3) (815-5) (819-20)

B.7.3 Alternatives – Hardened Onsite Storage (HOSS)

Several comments were received recommending that the NRC consider HOSS or other similar additional protections at existing sites as an alternative to the proposed action. Some commenters requested that NRC conduct studies comparing the relative safety of HOSS to the proposed action.

Response: The NRC's safety and environmental review is limited to an evaluation of the proposed CISF as described in ISP's license application. The No-Action alternative evaluates the potential impacts of leaving the SNF at current storage locations as a baseline for comparison against the potential environmental impacts of constructing and operating a proposed CISF. HOSS and other onsite hardening concepts are not being analyzed in detail because they do not meet the purpose and need of the proposed action (construction and operation of a CISF). Furthermore, this licensing action for a new facility does not propose or impose safety requirements for the storage of spent fuel at existing sites; therefore, assessing the impacts of HOSS and other hardened storage concepts at other sites will not be analyzed in this site-specific licensing process.

Comments: (3-15-3) (3-17-3) (3-19-7) (3-22-4) (3-28-2) (4-19-3) (58-5) (58-8) (118-5) (118-16) (121-2) (135-3) (163-2) (207-2) (321-2) (425-2) (434-1) (439-4) (468-8) (476-4) (515-2) (517-19) (519-8) (541-3) (570-1) (570-20) (573-4) (574-2) (632-2) (669-2) (779-3) (819-19) (819-32)

B.8 Comments Concerning Land Use

B.8.1 Land Use – General Comments

The NRC staff received comments that expressed concern about potential land use impacts from the proposed CISF, including economic effects and consequences from potential accidents or attacks that would affect the viability of the land for other uses. Commenters expressed concerns about irreversible commitments of land use and the potential conflicts with natural areas, tourism, energy and mineral mining, agriculture, and recreational activities in the area. One commenter raised questions about subsurface mineral rights for the oil and gas industry within the boundary of the proposed CISF. The same commenter was also concerned about the implication of subsurface extraction on induced seismicity and groundwater movement. Another commenter stated that the Texas-New Mexico state boundary may be inaccurate and implying that as a result, the proposed CISF may be located entirely in the State of New Mexico. One commenter stated that a 2007 publication by the IAEA recommended any away-from-reactor storage be sited away from mineral exploration, chemical manufacturing facilities, and airports.

Response: The EIS will include a description of land use within the proposed project boundary and the surrounding area. The impact assessment in the EIS will consider impacts of construction, operation, and decommissioning of the proposed CISF on land use in the area, as well as a discussion of appropriate mitigation measures. This assessment will discuss proposed land use agreements and land ownership and will address potential conflicts with other nearby land uses, such as prohibitive mineral usage agreements. However, because the NRC does not have authority over nonnuclear private business ventures, specific business interests of companies will not be included in the scope. The scope of the EIS with respect to industries in the area and tourism are discussed in this report in Sections B.18 [Socioeconomics]. Information on induced seismicity is discussed in Section B.14.3 [Geology and Soils – Induced Seismicity], and groundwater in Section B.12 – [Groundwater Concerns – Aquifers].

Comments: (6-10) (14-5) (16-6) (45-6) (84-2) (94-3) (102-5) (109-2) (408-4) (462-8) (502-25) (517-11) (542-1) (544-1)

B.8.2 Land Use – Concerning HLW at the WCS Site

The NRC staff received comments on the use of land within the WCS site for storage of HLW. Commenters noted that the agreement and acceptance of the WCS facility by the community was contingent on use of the facility for non-HLW. Commenters expressed disappointment that the proposed action would allow the land at the WCS site (i.e., a portion of which would be the proposed location of the CISF) to be used to store SNF.

Response: The EIS will include a description of land use within the proposed project boundary and the surrounding area. The impact assessment in the EIS will consider impacts of construction, operation, and decommissioning of the proposed CISF on land use in the area, as well as a discussion of appropriate mitigation measures. However, because the NRC does not have authority over private business ventures, specific business interests of companies will not

be discussed in the EIS. The cumulative impact of land usage outside the proposed CISF project area, including but not limited to the other WCS disposal and storage operations onsite, will be evaluated in the EIS. Prior statements about land use by WCS or previous operators are outside of the scope of this EIS and will not be considered further. Additional discussion regarding the scope of the proposed action for the EIS can be found in Section B.4 [Proposed Action]. Comments concerning consent-based siting of the proposed CISF can be found in Section B.2.7 [NEPA Process: Public Participation – Consent-Based Siting].

Comments: (2-22-3) (2-29-1) (45-2) (98-8) (101-2) (108-4) (108-9) (563-4) (566-3) (591-2)

B.9 Comments Concerning Transportation of Spent Nuclear Fuel – Transportation Infrastructure

B.9.1 Transportation Infrastructure – Access to Rail

The NRC staff received comments requesting clarification on how reactors without rail access would ship SNF to the proposed CISF.

Response: The EIS will describe all the potential transportation modes that could be used to transport SNF from reactors to the proposed CISF and will consider potential impacts of these modes to ship the SNF.

Comments: (3-22-2) (4-4-2) (819-46)

B.9.2 Transportation Infrastructure – Condition of Transportation Infrastructure

The NRC staff received comments expressing safety concerns about the current condition of the transportation infrastructure, including rail lines, highways, and bridges. Commenters were concerned about the weight of shipments and where the funding would come from to upgrade rail lines. Commenters suggested that the track-inspection protocols should be described. Concerns were expressed about infrastructure-related derailments and the effects of oil boom traffic on congestion infrastructure, and accidents. Other commenters were concerned about road improvements that might be needed to move SNF from reactor sites without rail access. General concerns about routing, security, and emergency response planning were also expressed.

Response: The EIS will describe the expected physical parameters of SNF shipments (including weights, capacities, packaging) and describe applicable regulations and the roles and responsibilities for identifying and reviewing transportation routes and ensuring the infrastructure along transportation routes is acceptable for the safe transportation of SNF. The EIS will also describe applicable preparations and planning of Federal, State, and local governments and by the railroad industry, which includes considerations of equipment, infrastructure, training, and funding. However, an evaluation of upgrades to existing infrastructure at or near specific reactor sites will not be evaluated in the EIS. The accident rates considered in the transportation impact analysis in the EIS will implicitly account for the range of factors that lead to accidents, including the effect of infrastructure. Local transportation conditions and challenges, including the existing levels of traffic and the additional traffic from the proposed project, will also be considered. The comments included a number of related issues that are addressed elsewhere in this report: comments regarding transportation accidents are described in Section B.10.4 [Transportation Safety/Accidents – Transportation Accidents]; comments about transportation routing are described in Section B.10.6 [Transportation Safety/Accidents –

Transportation Routes]; security and safeguards for transportation is described in Section B.30.8 [Out of Scope – Security and Terrorism]; and emergency response planning is described in Section B.27 [Emergency Management].

Comments: (1-3-1) (1-5-3) (1-7-3) (3-19-1) (3-24-2) (3-24-5) (4-1-2) (285-1) (400-4) (476-6) (505-5) (505-9) (527-3) (552-4) (645-7) (686-2) (721-1) (762-1) (793-1) (804-4) (818-1) (819-44)

B.9.3 Transportation Infrastructure – Proposed Rail Spur

The NRC staff received a comment about the proposed construction of a rail spur at the proposed CISF project. The commenter requested a description of the costs, ownership, liability, and future maintenance.

Response: The EIS will describe the general characteristics of proposed construction of the rail spur and evaluate the environmental impacts of the construction activities. The EIS will describe the general characteristics of the rail spur including the ownership, which also conveys liability and maintenance responsibility. The EIS will also include a cost benefit analysis that will disclose the major costs associated with the proposed CISF. The EIS cost benefit analysis will take into consideration CISF construction, including the rail spur construction, as appropriate.

Comments: (140-4)

B.10 Comments Concerning Transportation of Spent Nuclear Fuel – Safety/Accidents

B.10.1 Transportation: Safety/Accidents – Incident-Free Transportation Impacts

The NRC staff received comments recommending that incident-free radiation exposure from the proposed SNF shipments be included in the transportation impact analysis. Commenters expressed concerns about members of the public that could be exposed under normal incident-free conditions of transportation, including people who live and work near rail lines and roads, pregnant women, and children. Several commenters suggested it would be like getting an additional x-ray, although one commenter mentioned they would have to stand very close to a package for some time to receive that level of exposure. Other commenters expressed concerns about rail worker exposures, including engineers and inspectors. Others noted some local roads follow the rail lines, so local traffic could be an exposure pathway. Some commenters suggested specific methods for analysis of incident-free impacts including using an 800 m [875 yd] lateral distance from the train in calculating doses or using a specific train speed.

Response: The transportation impact analysis in the EIS will consider incident-free doses to workers and members of the public from SNF shipments to and from the proposed CISF. These analyses will consider how the mode of transport would affect the incident-free doses and would consider exposures to members of the public that live or work near transportation routes, rail workers such as crew and inspectors, and the additive effect of the number of shipments on dose estimates. The EIS will describe the methods used in the analysis and why they are applicable to evaluating the environmental impacts of incident-free transportation impacts. Other comments about the number of shipments are described in this Section B.10 [Transportation Safety/Accidents]. Comments about radiation health hazards are described in Section B.22 [Radiological Health].

Comments: (1-9-1) (1-15-3) (1-15-10) (1-17-6) (1-18-2) (2-18-3) (4-9-5) (4-12-1) (4-12-3) (4-25-1) (28-7) (28-9) (28-10) (134-6) (518-13) (525-2) (571-8) (571-13) (819-23)

B.10.2 Transportation: Safety/Accidents – International Transportation Experience

A commenter recommended that the NRC EIS consider international experience in the transportation of SNF.

Response: NRC programs are informed by and generally consistent with other international nuclear regulatory programs and experience. The EIS will evaluate the potential environmental impacts of the transportation of SNF based on methods that are based in science and generally applied and accepted internationally.

Comments: (2-32-1)

B.10.3 Transportation: Safety/Accidents – Potential External Contamination on Transportation Packages

The NRC staff received comments expressing concerns about the potential for undetected external contamination on SNF transportation casks that are proposed to be shipped to or from the CISF.

Response: The EIS transportation impact analysis will describe the applicable requirements and operational practices that address the potential for external contamination on a transportation cask that is being prepared for shipment. Comments expressing similar concerns about external contamination on casks are described in Section B.26 [Safety].

Comments: (4-12-2) (28-11)

B.10.4 Transportation: Safety/Accidents – Transportation Accidents

The NRC staff received comments expressing concerns about the potential for SNF transportation accidents and associated consequences. Many commenters expressed general concerns about SNF transportation accidents, while others focused on accident causes, rates of occurrence, scenarios, and consequences. Potential causes of accidents described by commenters included the weight of shipments; transportation of flammable materials, such as crude oil; road crossings; the large number of proposed shipments; terrorism; track condition; and sinkholes. Issues of concern regarding accident rates included the local reported train derailments and discussions about national accident rates. Consequences of accidents were a primary concern, with most commenters that assuming radioactive material would be released. Some commenters were concerned with the costs of cleanup from accidents involving a release. Others were concerned about the possibility of a barge accident. Some expressed concerns with potential locations of accidents, noting bodies of water or where residences or businesses are located.

Response: The EIS will consider the potential radiological and nonradiological impacts of transportation of proposed SNF shipments under incident-free and accident conditions, based on available information. The radiological impact analysis under accident conditions will evaluate SNF shipments in NRC certified transportation casks and consider variables, such as the number of shipments, cask inventory, routing, accident rates, accident severity, cask integrity and how the cask responds to accidents by severity, and radiological risk estimates.

The nonradiological accident impact analysis will consider estimates of potential traffic fatalities from SNF shipments. Comments about terrorism are described in Section B.30.8 [Out of Scope – Security and Terrorism].

Comments: (1-8-1) (1-15-7) (1-18-8) (1-20-5) (1-26-1) (1-26-3) (1-29-1) (2-5-5) (2-8-7) (2-18-5) (2-22-4) (3-13-3) (3-19-4) (3-24-3) (3-24-6) (4-18-2) (4-23-3) (17-2) (28-5) (30-5) (30-7) (38-4) (40-2) (43-2) (45-4) (50-2) (50-4) (58-6) (63-2) (64-1) (65-1) (68-3) (86-2) (87-5) (98-1) (99-2) (99-5) (99-15) (100-3) (101-6) (103-1) (110-2) (118-8) (118-9) (122-4) (124-2) (128-5) (134-1) (134-9) (140-2) (147-3) (151-1) (161-2) (161-3) (164-5) (164-6) (164-10) (164-11) (164-15) (164-16) (166-2) (169-1) (171-10) (174-4) (175-1) (178-1) (180-1) (184-1) (193-4) (195-3) (212-1) (220-7) (220-8) (220-19) (225-2) (234-1) (246-1) (247-1) (258-1) (263-1) (267-1) (318-5) (321-1) (324-2) (324-5) (324-6) (327-2) (396-3) (398-3) (398-5) (401-5) (403-2) (406-4) (408-17) (408-18) (409-2) (416-1) (420-3) (424-2) (431-1) (436-5) (436-9) (439-3) (443-1) (448-5) (451-2) (455-1) (462-2) (470-3) (470-4) (477-3) (502-11) (502-14) (516-2) (517-2) (518-1) (521-3) (522-13) (523-11) (525-1) (528-4) (530-3) (536-2) (539-5) (539-19) (545-18) (545-20) (553-2) (557-2) (559-5) (563-3) (567-2) (570-3) (574-3) (576-1) (580-2) (589-7) (590-2) (591-4) (592-2) (595-3) (632-3) (665-1) (668-1) (674-3) (683-1) (697-1) (707-1) (708-1) (708-2) (709-2) (775-1) (776-1) (778-1) (793-2) (796-1) (804-1) (815-2)

B.10.5 Transportation: Safety/Accidents – Transportation Impact Analysis Approach

The NRC staff received several comments related to the impact analysis methods that the NRC would use to estimate radiological impacts from incident-free transportation and transportation accidents. Commenters suggested that the NRC transportation impact analysis should address national transportation of SNF and consider routing details, the number of shipments, the modes that would be used, the option of using legal weight truck shipments, and shipments from the proposed CISF to the repository. Some commenters recommended that NRC consider or not consider specific prior analyses conducted by NRC or DOE. Other commenters suggested that the analysis should address the transportation of high burnup SNF. Another commenter suggested that the NRC analysis should consider new policy recommendations regarding the transportation of SNF.

Response: The EIS will consider the potential radiological and nonradiological impacts of transportation of proposed SNF shipments under incident-free and accident conditions, based on available information. The transportation impact analysis in the EIS will consider incident-free doses to workers and members of the public from SNF shipments to and from the proposed CISF. These analyses will consider how the mode of transport would affect the incident-free doses and would consider exposures to members of the public that live or work near transportation routes, rail workers such as crew and inspectors, and the additive effect of the number of shipments on dose estimates. The EIS will describe the methods used in the analysis and why they are applicable to evaluating the environmental impacts of incident-free transportation impacts. The radiological impact analysis under accident conditions will evaluate SNF shipments in NRC-certified transportation casks and consider variables, such as the number of shipments, cask inventory, routing, accident rates, accident severity, cask integrity and how the cask responds to accidents by severity, and radiological risk estimates. The nonradiological accident impact analysis will consider estimates of potential traffic fatalities from SNF shipments. Considering new policy recommendations is beyond the scope of the EIS. Other comments about the number of shipments are described in Section B.10 [Transportation Safety/Accidents]. Comments about radiation health hazards are described in Section B.22 [Radiological Health].

Comments: (3-2-4) (4-18-1) (4-19-1) (4-21-5) (5-4) (30-2) (30-6) (55-1) (121-3) (139-6) (149-3) (165-11) (165-19) (401-3) (505-4) (518-8) (570-15) (819-45)

B.10.6 Transportation: Safety/Accidents – Transportation Routes

The NRC staff received comments about routes for proposed SNF shipments from reactors to the proposed CISF and from the proposed CISF to a future repository. Commenters requested the routes and modes of transportation for SNF shipments be specified. Other commenters expressed concerns that the routes were not specified, thereby making it difficult to provide comments on the proposed transportation. Some commenters suggested that NRC action on the proposal should be delayed until routes are specified, while others recommended that an analysis of potential routes should be conducted in the EIS. Commenters provided examples of local government resolutions that had been passed to oppose transportation through specific cities. Some commenters were concerned about accidents and emergency response preparedness and response capabilities along the routes. Others were concerned about terrorism affecting areas along routes.

Response: The specific transportation routes for proposed SNF shipments will likely not be determined until well after a licensing decision has been made. However, the EIS will consider representative transportation routes in evaluating the potential radiological impacts to workers and the public from transportation of SNF to and from the proposed CISF. The EIS will also specify the applicable modes of transportation that are included in the transportation impact analyses. Comments about emergency response are described in Section B.27 [Emergency Management]. Comments about transportation accidents are described in this Section B.10 [Transportation Safety/Accidents].

Comments: (2-2-1) (3-2-1) (3-3-2) (4-26-2) (27-4) (28-4) (30-4) (58-4) (139-16) (149-5) (149-8) (165-17) (165-26) (400-7) (401-4) (415-3) (415-6) (438-1) (476-8) (502-1) (518-5) (518-6) (518-7) (518-9) (540-8) (555-3) (576-2) (595-5) (620-6) (645-1) (819-42)

B.10.7 Transportation: Safety/Accidents – General Comments

The NRC staff received comments expressing general concerns about the proposed SNF transportation from existing sites to the CISF and from the CISF to a repository. Concerns focused on a variety of topics, including routing and the proximity of people and towns; the viability of casks and canisters; the logic of conducting national SNF transportation two times prior to final disposal; public risk and the potential for health effects; and rail route safety, rail track, and rail shipment inspections.

Response: The EIS will include an analysis of transportation impacts. Comments about the potential for health effects are described in Section B.22 [Radiological Health]. The remaining topics addressed by the general transportation safety concerns overlapped with the more detailed sets of comments included within this section [Transportation Safety/Accidents].

Comments: (1-8-3) (1-9-7) (1-12-1) (1-12-4) (1-12-7) (1-17-5) (1-23-2) (2-10-2) (2-11-7) (2-13-6) (2-15-1) (2-20-3) (3-3-10) (3-5-8) (3-6-4) (3-7-2) (3-16-2) (4-3-1) (4-3-6) (4-14-10) (4-26-4) (18-3) (19-2) (24-5) (28-1) (28-25) (32-3) (33-2) (38-1) (42-2) (50-3) (67-2) (71-2) (71-4) (75-2) (88-1) (96-2) (102-4) (109-4) (111-2) (118-1) (118-14) (120-1) (122-2) (128-3) (134-3) (135-2) (142-2) (145-3) (145-4) (153-2) (164-1) (164-2) (164-3) (164-8) (164-13) (170-3) (177-2) (185-1) (191-1) (193-5) (198-1) (203-2) (206-2) (209-3) (217-2) (218-1) (220-2) (226-1) (236-1) (238-1) (264-9) (284-2) (317-1) (324-4) (334-2) (338-2) (339-13) (395-6) (401-2) (407-3) (417-2)

(418-2) (421-4) (429-2) (462-4) (469-2) (476-2) (478-2) (490-3) (521-2) (522-8) (545-2) (550-3) (554-3) (561-4) (571-2) (571-4) (575-3) (620-15) (632-4) (634-1) (673-1) (676-2) (706-1) (709-1) (710-1) (711-1) (722-2) (724-1) (755-2) (763-1) (774-1) (793-4) (794-2) (805-2) (818-2)

B.11 Comments Concerning Water Resources

B.11.1 Water Resources – Comments from U.S. Environmental Protection Agency (EPA)

The NRC staff received comments from the EPA concerning water resources. The EPA recommended that the EIS describe the original (natural) drainage patterns in the proposed CISF area, as well as the potential impacts to drainage patterns of the area, and identify whether any areas are within a 50 or 100-year floodplain. EPA also pointed out that the EIS should describe groundwater conditions, assess potential impacts to groundwater quality and quantity, and identify mitigation measures to reduce adverse impacts to groundwater quality. The EPA suggested that the EIS include a description of the stormwater pollution prevention plan. EPA recommended that the EIS discuss potential Federal requirements and permitting to ensure protection of water resources at the proposed CISF.

Response: The EIS will describe surface water and groundwater conditions at the proposed CISF and assess the potential impacts to surface water and groundwater, including quality and quantity, from construction, operation, and decommissioning. Facility design as it relates to the 100-year floodplain will be evaluated in the NRC's SER and relevant information will be incorporated into the EIS. The EIS will also address stormwater discharge and Federal Clean Water Act permitting requirements and associated mitigation measures designed to protect surface waters and groundwater, if applicable.

Comments: (16-1) (16-3) (16-4)

B.11.2 Water Resources – Flooding

The NRC staff received comments about the potential impacts of flooding. Commenters were concerned about the impacts of a large rainfall event(s) and the associated potential for flooding. One commenter requested that the EIS contain a detailed flood analysis.

Response: The EIS will assess the potential impacts to water resources. The potential for flooding to the proposed CISF will be addressed in the NRC's SER and the potential environmental impacts of surface water drainage (i.e., surface water runoff) will be evaluated in the EIS. As appropriate, the assessment will include an analysis of mitigation measures to address potential adverse impacts.

Comments: (570-11) (788-1) (790-1)

B.11.3 Water Resources – General Concerns

The NRC staff received comments on the impacts from the proposed CISF on surface water and groundwater. Commenters expressed concerns about the risks to water supplies, specifically due to radioactive contamination. Some commenters were concerned that the use of water at the proposed facility would take away the water resources needed for the dairy and oil and gas industries. One commenter questioned if the proposed CISF would have access to enough water to combat an onsite fire emergency. Another commenter stated that the limited

water available in the area was already being used for dust suppression. A commenter requested an unbiased hydrologic study of proposed project area. One commenter expressed concern about previous TCEQ water resource evaluations related to the licensing of LLRW disposal at the WCS site.

Response: The EIS will assess the potential impacts to water resources from construction, operation, and decommissioning of the proposed CISF. An analysis of any credible accidents will be addressed in the NRC's SER and potential environmental impacts of these events will be evaluated in the EIS. As appropriate, the EIS will include an analysis of mitigation measures to address potential adverse impacts. In the EIS, the NRC staff will perform an independent assessment of the proposed site. Specific licensing/permitting actions taken by other agencies (e.g., TCEQ) may also occur in parallel to the NRC's review, but the NRC considers the best information available for its evaluation, including previous site studies. Additional comments concerning contamination of area aquifers and groundwater are addressed in Section B.12.1 [Groundwater – Contamination Concerns]. Information on the scope of the emergency response can be found in B.27 [Emergency Management].

Comments: (2-7-2) (2-8-6) (2-10-6) (7-1) (60-2) (61-1) (61-2) (61-5) (116-2) (118-11) (150-2) (161-12) (273-1) (412-13) (511-11) (559-17) (576-10) (590-4) (644-1)

B.12 Comments Concerning Groundwater – Aquifers

B.12.1 Groundwater – Contamination Concerns

The NRC staff received comments about the characterization and potential contamination of groundwater and aquifers from the proposed project, including concerns about drinking water contamination. Commenters expressed concerns about deterioration and/or breakage of canisters and containers and the leakage of radioactive materials into groundwater. Other commenters expressed concerns about radioactive material spills and accidents and the impact on groundwater. One commenter requested that the EIS examine the impact to groundwater and aquifers from a release of radioactive material and the potential impact to the nearby oil and gas industry. Another commenter was concerned about the impact of fracking fluid disposal on the proposed CISF as well as the impact of the proposed CISF on fracking in the area. Commenters also stated that the area is surrounded by aquifers and that some near-surface perched groundwater systems are already contaminated. One commenter was concerned about the potential impacts to surface water and groundwater along rail transportation routes. Some commenters expressed concern about previous TCEQ water resource evaluations related to the licensing of LLRW disposal at the WCS site.

Response: The EIS will include a description and characterization of the surface and groundwater resources in the vicinity of the proposed CISF and will assess the potential impacts of the proposed action on area aquifers and groundwater. An analysis of any credible accidents will be addressed in the NRC's SER and potential environmental impacts of these events will be evaluated in the EIS. As appropriate, the EIS will include an analysis of mitigation measures to address potential adverse impacts. In the EIS, the NRC staff will perform an independent assessment of the proposed site. Specific licensing/permitting actions taken by other agencies (e.g., TCEQ) may occur in parallel with the NRC's review, but the NRC considers the best information available for its evaluation, including previous site studies. Information on the scope of the transportation, accident, and safety analyses that will be included in the EIS can be found in Sections B.10, B.25, and B.26, respectively.

Comments: (1-15-4) (2-14-3) (3-13-2) (7-5) (14-2) (30-8) (38-3) (45-5) (99-4) (127-7) (128-4) (134-15) (143-2) (157-6) (169-2) (173-2) (175-2) (220-9) (339-7) (491-9) (502-10) (539-16) (552-2) (554-6) (558-5) (558-7) (564-3) (567-3)

B.12.2 Groundwater – The Ogallala Aquifer

The NRC staff received comments about the characterization and potential contamination of the Ogallala Aquifer. Several commenters stated that it is a misconception that the proposed CISF site is over the Ogallala Aquifer, while other commenters stated definitively that the proposed CISF was on top of the Ogallala Aquifer. Commenters expressed concerns about the Ogallala Aquifer, including about potential contamination of the aquifer from a release of radioactive material from the proposed CISF, with some specific concerns regarding the Ogallala Aquifer as a source of drinking water. Commenters noted that contamination of the Ogallala Aquifer could result from leaks, spills, and accidents. Commenters stated that aquifers under and adjacent to the proposed CISF could be in direct communication with the Ogallala Aquifer and that more studies should be conducted to determine its actual location. Some commenters provided subsurface hydrogeologic characterization and water well information.

Response: The EIS will assess the potential impacts of the proposed CISF on groundwater resources, including the Ogallala Aquifer. The EIS will address and evaluate the potential for transportation, handling, and consolidated interim storage of SNF to impact the Ogallala Aquifer during construction, operation, and decommissioning of the proposed CISF. The potential for credible accidents will be addressed in the NRC's SER and potential environmental impacts of such accidents will be evaluated in the EIS. As appropriate, the EIS will include an analysis of mitigation measures to address potential adverse impacts. Additional comments concerning contamination of area aquifers and groundwater are addressed in Section B.12.1 [Groundwater – Contamination Concerns], and information on the scope of the transportation, accident, and safety analyses that will be included in the EIS can be found in Sections B.10, B.25, and B.26, respectively.

Comments: (1-10-1) (1-17-3) (1-23-5) (1-32-1) (1-37-2) (2-3-2) (2-6-2) (2-13-3) (2-14-7) (2-19-2) (2-33-2) (3-16-1) (4-7-2) (4-10-2) (4-14-2) (4-18-3) (4-24-1) (24-3) (27-3) (28-14) (50-6) (67-1) (72-2) (76-3) (76-7) (98-2) (101-5) (102-3) (103-2) (108-8) (111-3) (118-10) (122-5) (139-12) (140-6) (142-7) (145-2) (146-5) (164-18) (174-3) (232-1) (272-1) (277-4) (281-1) (284-4) (395-2) (408-8) (415-7) (441-2) (460-12) (490-2) (516-3) (522-5) (540-9) (542-2) (542-4) (542-5) (545-15) (566-5) (566-8) (566-13) (570-12) (576-5) (620-7) (645-11)

B.12.3 Groundwater – General Concerns

The NRC staff received comments about potential impacts to water resources. Commenters expressed concern about the proposed CISF being located over or near a known aquifer. One commenter stated that the proposed CISF would be a wet site due to changes in climate over the license term and beyond. Other commenters pointed out that there is no danger to water because the SNF would be stored in a location not in contact with surface water or groundwater resources. Some commenters stated that potential contamination would threaten the water supply and water quality in the area. One commenter stated that the proposed CISF would be located above brackish water aquifers, and that non-potable water can still be used for agricultural purposes. One commenter provided additional information on the Dockum Aquifer.

Response: The EIS will assess the potential impacts to water resources from construction, operation, and decommissioning of the proposed CISF. As appropriate, the assessment will

include an analysis of mitigation measures to address potential adverse impacts. The NRC will review the references recommended in these comments and, if appropriate, will include them in the EIS analysis. Additional comments concerning the Ogallala Aquifer, flooding, water supply and contamination, and waste disposal are addressed in Sections B.12.2 [Groundwater – Ogallala Aquifer], and B.12.1 [Groundwater – Contamination Concerns].

Comments: (1-13-7) (1-14-1) (1-20-1) (1-20-3) (1-21-1) (1-21-3) (1-21-5) (1-30-1) (1-32-2) (1-37-3) (2-17-4) (2-28-1) (3-5-2) (3-6-3) (6-7) (9-2) (21-2) (95-3) (127-3) (128-2) (147-2) (171-1) (193-2) (197-1) (206-1) (351-2) (412-12) (462-6) (478-3) (502-22) (528-10) (542-3) (546-3) (755-4)

B.13 Comments Concerning Water Resources – Surface Water

B.13.1 Surface Water – New Mexico Environment Department (NMED) Permitting

The NRC received a comment noting a prior request by NMED regarding a water discharge permit for the WCS site. The commenter requested a monitoring well be placed down-gradient from the WCS facility on the New Mexico side of the state line for future sampling events. The commenter suggested methods for altering surface drainage features and requested a hearing in Eunice to discuss the water permit and siting of the facility.

Response: The EIS will consider the potential environmental impacts to groundwater and surface water that may result from the proposed project. As appropriate, the EIS will make recommendations for monitoring or mitigations. As part of the environmental review, the NRC will be coordinating with appropriate State agencies, including NMED. Specific licensing/permitting actions taken by other agencies (e.g., NMED) may also occur in parallel to the NRC's review, but the NRC considers the best information available for its evaluation, including previous site studies. However, interactions between the applicant and state agencies, including submitting permit applications, are beyond the scope of this environmental review and will not be addressed in the EIS beyond a discussion of any permits that are required. More information about public participation is discussed in Section B.2 [NEPA Process – Public Participation] of this report.

Comments: (558-9) (558-11)

B.13.2 Surface Water – General Concerns

The NRC staff received comments concerning surface water resources on or near the proposed CISF site. Commenters expressed concerns about the level of detail included in the license application for (i) the description of playa lakes, (ii) discussion of waterways and surface water draws in the area, (iii) stormwater runoff onsite and surface water flow into New Mexico, and (iv) heavy rainfall events. One commenter was concerned about water contamination due to canister and cask failure along transportation routes that could impact waterways.

Response: The EIS will assess the potential impacts to surface waters from the proposed CISF. The potential environmental impacts to playa lakes from construction, operation, and decommissioning of the proposed CISF will be addressed and evaluated in the EIS. The EIS will include characterization of surface water features and drainages and evaluate any potential impacts. As appropriate, the assessment will include an analysis of mitigation measures to address potential adverse impacts. Information on the scope of the transportation, accident,

and safety analyses that will be included in the EIS can be found in Sections B.10, B.25, and B.26, respectively.

Comments: (1-7-4) (1-37-1) (4-10-3) (108-7) (161-11) (559-6) (570-9) (573-2)

B.14 Comments Concerning Geology and Soils Resources

B.14.1 Geology and Soils – General Comments

The NRC staff received several comments about geological and soil conditions at and in the area of the proposed CISF site. Some commenters stated that geological and soil conditions make the proposed CISF site suitable for SNF storage. Reasons cited by these commenters included: (i) the stable geologic environment, (ii) low seismic activity, (iii) arid climate, (iv) soil composition, and (v) lack of water sources. Other commenters stated that geological and soil conditions make the proposed CISF site unsuitable for storing SNF. Reasons cited by these commenters included: (i) the porous and permeable sediments and sedimentary rocks; (ii) the karst terrain (i.e., cave development in underlying limestone and evaporite formations); (iii) unstable geology due to seismic activity or subsidence; (iv) lack of subsurface characterization; and (v) presence of oil and gas reserves and industry. One commenter suggested that more recent seismic data should be gathered or collected to evaluate the potential for earthquakes and subsidence in nearby areas.

Response: The EIS will assess the potential impacts to geology and soils from the proposed CISF, including consideration of local geologic structure, site stratigraphy, characteristics of the soils, and any other significant geological and soil conditions. The potential for earthquakes or any other major ground motion considerations resulting from natural geologic phenomena (e.g., faulting and volcanism) will be addressed in the NRC SER, and information will be incorporated in the EIS only as appropriate to evaluate the environmental impacts of construction, operation, and decommissioning of the proposed CISF. The NRC will review commenters' recommended references and incorporate information from them if found to be appropriate for the analysis. Related comments concerning induced seismicity (i.e., earthquakes resulting from oil and gas exploration and development activities) are addressed in Section B.14.3 [Geology and Soils – Induced Seismicity] and comments concerning sinkholes and subsidence in the area of the proposed CISF are addressed in Section B.14.2 [Geology and Soils – Sinkholes and Subsidence].

Comments: (1-7-5) (1-19-2) (1-21-2) (1-30-2) (2-6-1) (2-14-6) (2-19-1) (2-23-3) (2-28-3) (3-4-1) (3-4-3) (3-5-3) (3-5-6) (3-16-10) (3-23-1) (14-6) (30-13) (40-8) (61-6) (99-10) (138-3) (139-19) (143-3) (171-4) (220-15) (339-6) (408-5) (420-6) (445-5) (460-14) (522-2) (546-4) (554-5) (561-2) (566-15) (589-3) (681-1)

B.14.2 Geology and Soils – Sinkholes and Subsidence

The NRC staff received several comments that expressed concerns about subsidence and sinkholes in the area of the proposed CISF. Some commenters pointed out that the proposed CISF is located in a limestone and evaporite (salt rock) terrain characterized by karst development (caves and sinkholes) that is unstable and not suitable for SNF storage. Other commenters mentioned sinkholes of anthropogenic (man-made) origin (e.g., solution mining of salt beds) that have developed in the area of the proposed CISF as well as natural sinkholes developed from the dissolution of subsurface material. One commenter expressed concern about the development of karst features related to leaking or improperly cased wastewater

injection wells from the oil and gas industry. Other commenters expressed a generalized concern about the impact of regional subsidence on the CISF, while one commenter referred NRC staff to an additional study on regional subsidence.

Response: The EIS will include a description of the geology in the area, including any karst features that may be present. The potential for sinkholes and subsidence will be addressed in the NRC SER. Information from the NRC SER regarding these phenomena will be included in the EIS only as appropriate to describe the affected environment and to evaluate the environmental impacts of construction, operation, and decommissioning of the proposed CISF. The NRC will review the references recommended in these comments and, if appropriate, will include them in the EIS analysis.

Comments: (3-5-5) (161-6) (173-1) (408-2) (408-6) (408-7) (408-9) (408-31) (522-4) (542-6) (558-6) (566-14) (570-8)

B.14.3 Geology and Soils – Induced Seismicity

The NRC staff received comments about induced seismicity in the area of the proposed CISF caused by oil and gas exploration and development activities. Commenters were concerned about earthquakes and tremors caused by horizontal drilling techniques and hydraulic fracturing (fracking) and injection of wastewater into disposal wells. Commenters pointed out that fracking in the Permian Basin has increased greatly and continues to grow, potentially increasing the risk of seismic activity at the proposed CISF. Commenters suggested that additional studies and analyses be conducted to evaluate the seismic hazard over the license term of the proposed CISF.

Response: Potential seismic impacts at the site, including induced seismicity, will be considered in the NRC SER. The potential for oil and gas exploration and development activities to induce earthquakes or any other major ground motion considerations also will be addressed in the NRC SER. Information from the SER will be included in the EIS only as appropriate to describe the affected environment and to evaluate the environmental impacts of construction, operation, and decommissioning of the proposed CISF.

Comments: (1-18-10) (1-23-4) (3-4-2) (4-9-6) (6-6) (142-8) (161-7) (173-3) (173-4) (265-2) (343-1) (408-3) (413-4) (502-20) (511-9) (511-20) (517-10) (523-9) (527-11) (528-6) (539-14) (548-2) (570-7) (595-2) (679-1) (734-2)

B.15 Comments Concerning Ecology

B.15.1 Ecology – Comments from EPA

The EPA provided comments and recommendations regarding the NRC staff's evaluation of potential impacts to ecological resources from the proposed CISF. The EPA recommendations included that the EIS should (i) identify species or critical habitat potentially affected by each alternative and possible practicable mitigations, as well as the potential for compensatory mitigation for unavoidable impacts to waters of the U.S. and biological resources; (ii) identify potential compensatory mitigation lands or available lands for compensatory habitat mitigation; (iii) address the potential impact of construction, installation, and maintenance activities (e.g., deep trenching, grading, filling, and fencing on habitat); and (iv) incorporate mitigation, monitoring, and reporting measures that result from consultation with the U.S. Fish and Wildlife Service (FWS).

Response: The EIS will describe the affected ecological environment at the proposed CISF based on information provided by the applicant and obtained through independent research. The EIS will identify all candidate and listed threatened and endangered species and designated critical habitat within the project area, including State-listed species. The EIS will also include a discussion of potential impacts to habitats, including areas that could be affected by surface water runoff and potential impacts to wildlife that could occur during all stages (construction, operation, and decommissioning) of the proposed CISF project. The NRC staff will coordinate with appropriate Federal and State natural resource agencies to identify appropriate mitigation measures to minimize impacts on habitats. As a result of this interagency coordination, the EIS will include a discussion of mitigation and monitoring measures for the proposed CISF project. The EIS will include an analysis of radiological, physiochemical, and ecological environmental monitoring measures.

Comments: (16-5)

B.15.2 Ecology – Comments from Texas Parks and Wildlife Department (TPWD)

The TPWD provided comments and recommendations regarding the NRC staff's evaluation of potential impacts to ecological resources from the proposed CISF. The TPWD commented on migratory bird species that may be found in the area and recommended excluding vegetation-clearing activities during the general bird nesting season, March through August, to avoid adverse impacts. If clearing activities cannot be delayed, TPWD recommended surveying the area proposed for disturbance to ensure that no nests with eggs or young will be disturbed. The TPWD commented on the suitability of Lesser prairie-chicken habitat and recommended that ISP monitor the listing status of the species. TPWD also recommended avoiding the Texas horned lizard and colonies of its primary food source, the Harvester ant, during clearing and construction, and recommended that a permitted biological monitor be present during construction. TPWD identified the dunes sagebrush lizard as a rare species that may be present in the project area and recommended conservation measures for ISP to implement within suitable dunes sagebrush lizard habitat. Lastly, the TPWD recommended that ISP review the lists of rare species, natural plant communities, and special features, and that precautions be taken to avoid impacts to them.

Response: The NRC staff welcomes TPWD recommendations on mitigation measures that could limit ecological impacts from the proposed CISF. The EIS will describe the affected ecological environment at the proposed CISF based on information provided by the applicant and obtained through independent research. The EIS will identify all candidate and listed threatened and endangered species and designated critical habitat within the proposed project area, including State-listed species. The EIS will also include a discussion of potential impacts to wildlife that could occur during all stages (construction, operation, and decommissioning) of the proposed CISF project, including potential impacts to migratory birds, Lesser prairie-chickens, Texas horned lizards, and dunes sagebrush lizards. The NRC staff will conduct an independent analysis of potential effects that the proposed project may have on these species. As appropriate, the EIS will discuss mitigation measures identified during the environmental review. The NRC staff will review the recommendations TPWD has made with respect to this licensing action and, as practicable, carry forward those recommendations in the EIS. The NRC staff will remain in contact with TPWD staff during the environmental review process.

Comments: (529-1) (529-2) (529-3) (529-4) (529-5)

B.15.3 Ecology – General Comments

The NRC staff received comments regarding the ecosystems found in the proposed CISF project area. Commenters expressed concern about impacts the proposed project would impose on wildlife in the area around the CISF.

Response: The EIS will evaluate the potential impacts to ecological resources from the proposed action. The NRC staff will consider factors such as the disturbance or removal of vegetation, changes in surface water and groundwater quantity and quality, habitat loss or alteration, displacement of wildlife, and mortality due to encounters with vehicles or heavy equipment.

Comments: (14-1) (52-2) (117-2) (819-40)

B.16 Comments Concerning Meteorology and Air Quality

B.16.1 Meteorology and Air Quality – Baseline Air Quality

The NRC staff received comments concerning the importance of having good air quality near the proposed project site.

Response: The EIS will include a characterization of the existing or baseline nonradiological air quality in the affected environment section. The potential impacts to air quality from the proposed CISF will be compared to the baseline. The EIS will also include a cumulative impacts analysis of air quality. The scope of the EIS with respect to radiological air quality is discussed in Section B.22 [Radiological Health] of this report.

Comments: (61-7) (329-4)

B.16.2 Meteorology and Air Quality – EPA Recommendations for the EIS

The EPA recommended that the EIS include the following topics: (i) baseline ambient air conditions that address both criteria and non-criteria pollutants, as well as National Ambient Air Quality Standards (NAAQS) attainment status in the area; (ii) quantified emission estimates that account for the lifespan of the project; address the various project stages (e.g., construction and operation), as well as transportation-related activities; and specify emissions from mobile, stationary, and fugitive sources; (iii) potential air quality impacts from the proposed CISF project, as well as a cumulative impact analyses; and (iv) mitigation, to include a draft construction emissions mitigation plan.

Response: The EIS will characterize the existing air quality conditions, including both criteria and non-criteria pollutants, as well as NAAQS attainment status in the geographic area and project air emissions. As appropriate, the project air emissions characterization will consider estimated emission levels, the lifespan of the proposed project, transportation-related activities, the project stages and activities, and the types of emission sources. The EIS will also analyze the potential air quality impacts from the proposed CISF, as well as the cumulative impacts. The EIS will identify and discuss relevant, reasonable mitigation measures that could reduce or avoid impacts.

Comments: (16-2) (16-9)

B.16.3 Meteorology and Air Quality – Natural Phenomena and Environmental Conditions

The NRC staff received comments concerning possible impacts to dry cask storage from natural phenomena, severe weather events, and the local environmental conditions. Specific topics identified by commenters included temperature extremes, wind, sand storms, wildfires, floods, tornadoes, and lightning strikes. One commenter stated that the climate was ideal for a CISF.

Response: As appropriate, the NRC’s safety evaluation will consider the potential impacts of natural phenomena hazards, severe weather events, and environmental conditions on dry cask fuel storage at the proposed ISP CISF. The safety performance and robustness of the cask storage system will be documented in the NRC’s SER. Information from the SER regarding these phenomena and cask performance will be included in the EIS only as appropriate to evaluate the environmental impacts of construction, operation, and decommissioning of the proposed CISF. Additional information about the scope of the EIS concerning specific natural phenomena, severe weather, and environmental conditions are located in other sections of this report such as Section B.26 [Safety], Section B.25 [Accidents], and Section B.17 [Climate Change].

Comments: (1-20-2) (2-23-2) (3-5-7) (6-13) (68-2) (113-2) (161-9) (339-5) (502-21) (511-10) (522-3) (523-10) (528-7) (540-11) (548-3) (552-3) (567-4) (570-13)

B.17 Comments Concerning Climate Change

B.17.1 Climate Change – Contribution of the Proposed CISF to Climate Change

The NRC staff received comments concerning the contribution of the nuclear industry (e.g., the proposed action, other nuclear facilities, and SNF transportation) to climate change. The commenters identified greenhouse gas emissions and energy flow as factors for consideration. One commenter requested that greenhouse gas emissions be quantified for all materials and facilities associated with the nuclear fuel cycle.

Response: The EIS will include a discussion regarding the contribution of the proposed CISF to climate change. That discussion will also consider mitigation measures to reduce the contribution of the proposed CISF to climate change. Because the scope of this EIS is limited to the proposed CISF facility, the contribution of greenhouse gases from other nuclear facilities in the U.S. is considered out of scope and will not be analyzed in this EIS.

Comments: (3-28-3) (412-10) (780-3)

B.17.2 Climate Change – Overlapping Impacts and Impacts on the Proposed Action

The NRC staff received comments concerning impacts from climate change. Commenters requested that the EIS analyze the environmental impacts of climate change on dry cask storage and components, including the impact of weather events that may be linked to climate change. Commenters identified specific natural phenomena and weather events within the context of climate change that they are concerned about, including drought, precipitation levels, ambient air temperatures, wildfires, floods, and tornadoes. One commenter stated that the EIS must examine climate change effects on the soil to determine if this creates any detrimental impacts on the site materials and casks. Another commenter stated that with climate change,

consolidating the SNF at a CISF would reduce the chances of leaching contamination into the surface and ground water.

Response: As appropriate, the EIS will analyze the contribution of the proposed CISF to climate change and will consider overlapping impacts of the proposed CISF and climate change. As required by regulation, the NRC safety evaluation will consider the effects of credible natural hazards and phenomena, including severe weather events, on the design and operation of the proposed CISF. The regulations require that the applicant consider external natural events, estimate the frequency and severity of these, and discuss the records or historical data used to determine them. The NRC will review the applicant's evaluations to confirm that the proposed CISF facility adequately protects against these natural events. The NRC has the statutory authority to revise the conditions of issued licenses and/or revise requirements, as necessary, to maintain adequate protection. Information from the SER regarding this topic will be included in the EIS only as appropriate to evaluate the environmental impacts of construction, operation, and decommissioning of the proposed CISF.

Comments: (4-5-3) (4-9-7) (4-10-4) (139-17) (318-2) (351-3) (527-8) (527-9) (527-10) (539-15) (567-5) (660-4) (740-2)

B.17.3 Climate Change – Recommendations for NEPA Analyses

The NRC staff received comments concerning the EIS climate change analysis. One commenter requested a focus on the science and facts of climate change. Another commenter discussed compliance with CEQ guidance concerning NEPA analyses of climate change.

Response: Concerning a focus on the science and facts of climate change, the NRC staff considers that information from government organizations such as the U.S. Global Climate Research Program (GCRP) and the EPA serve as appropriate information sources for climate change impacts. The NRC staff considers the following reports as examples of appropriate EIS information sources: Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II (GCRP, 2018) and Climate Science Special Report: Fourth National Climate Assessment, Volume I (GCRP, 2017). Concerning following CEQ on NEPA analyses of climate change, the NRC staff analyses in the EIS will be appropriately informed by relevant guidance on this matter from both the CEQ and NRC.

Comments: (3-10-6) (97-2)

B.18 Comments Concerning Socioeconomics

B.18.1 Socioeconomics – Impact on Other Industries

Several commenters expressed concern that the proposed CISF project would jeopardize other important industries in the Permian Basin, including oil and gas, farming, ranching, dairy, and the real estate market. Some commenters stated that the risks associated with the proposed project are not worth the potential impacts on other jobs and industries in the region. A few commenters requested that the NRC evaluate the possible economic impacts on other industries based on negative public opinion regarding the proposed project, as well as economic impacts on other industries from potential accidents at the proposed project site and along transportation routes.

Response: The EIS will discuss the socioeconomic region of influence (i.e., where the most socioeconomic changes are expected to occur from the construction and operation of the proposed CISF) and the major industries and employers within the socioeconomic region of influence. The EIS will also provide an analysis of potential socioeconomic impacts that could occur from the proposed construction and operation of the CISF with respect to taxes, employment, housing, and public services. The EIS will analyze reasonably foreseeable future events as part of the cumulative impacts analysis as well as credible accidents, as determined by the NRC safety evaluation, which could result in potential socioeconomic impacts within the region of influence. However, an analysis of public perception and its impact on other industries and along transportation routes is speculative and outside the scope of this EIS. Further discussion on the scope of accidents is provided in Section B.25 [Accidents] of this report. In addition, the EIS will include a cost-benefit analysis, as explained further in Section B.21 [Cost Considerations] of this report; however, the NRC staff does not base its licensing decisions solely on the economic benefits or costs of a proposed project.

Comments: (1-15-5) (445-3) (462-9) (491-6) (502-6) (511-16) (539-13) (539-24) (590-3) (596-2) (596-3) (670-1) (817-1) (819-36)

B.18.2 Socioeconomics – Jobs

One commenter stated that WCS overstated the number of jobs that the low-level waste facility would bring to the region. Another commenter was skeptical about the jobs promised for the proposed CISF. One commenter questioned the variety of jobs that the proposed project would create, while another commenter expressed concern that the number of estimated jobs the proposed project would create would not be worth the risk of storing SNF in their community.

Response: Socioeconomic impacts, such as the estimated number of workers that may be hired by ISP and income earned by those workers to construct, operate, and decommission the proposed CISF, and the availability of a workforce in the region, will be described and analyzed in the EIS. In particular, the EIS will consider the potential socioeconomic impacts from the potential direct and induced jobs created. However, specific hiring decisions (e.g., salaries and benefits) are business decisions to be made by the license applicant and, therefore, are outside of the scope of the EIS.

Comments: (3-19-5) (566-6) (566-16) (819-33)

B.18.3 Socioeconomics – Positive Economic Development

The NRC staff received comments in support of the proposed project for its potential to provide the region with economic development opportunities that would diversify the ISP facility and stabilize economic fluctuations in the oil and gas industry.

Response: The EIS will analyze the potential socioeconomic impacts that could result from the construction, operation, and decommissioning of the proposed CISF, including effects on employment, housing, tax structure, and community services within the region of influence. The scope of the socioeconomic analysis is further explained in responses to other comments in this section of this report. The EIS will also include a cost-benefit analysis of the proposed project; however, the NRC staff does not base its licensing decisions solely on the economic benefits or costs of a proposed project.

Comments: (1-17-8) (2-13-9) (43-6)

B.18.4 Socioeconomics – Property Values and Compensation

The NRC staff received a comment about whether, if constructed, the proposed CISF would negatively affect home values in the vicinity of the proposed CISF. One commenter stated that a compensation plan should be established before the CISF is developed that would go into effect when the CISF closes in order to protect the local tax base and essential public services, and assist with worker transition and new local economic development.

Response: The EIS will consider tax revenues that would be generated from the proposed CISF in the socioeconomic and cost-benefit sections of the EIS. However, positive or negative impacts on property values are too speculative to project and evaluate in detail and are outside the scope of the EIS.

Should the NRC issue the license, prior to cessation of operations, ISP would be required to submit a decommissioning plan to the NRC for review. For the current licensing review, the NRC staff will review the applicant's preliminary decommissioning plan and decommissioning funding plan and include a high-level discussion of these in the EIS, where applicable. However, NRC regulations do not require compensation to local communities when a business decision is made to cease operations and that consideration is beyond the scope of the EIS.

Comments: (4-13-5) (527-12)

B.18.5 Socioeconomics – Scope of Socioeconomic Analysis

The NRC staff received comments expressing general concerns about socioeconomic-related issues. Some commenters stated that there are a number of concerns which do not justify the potential economic benefits, if any, from the proposed CISF. Commenters recommended that the EIS analyze the economic consequences to businesses in the region. One commenter stated that the distribution of costs and benefits to members of the community is unclear.

Response: The scope of the socioeconomic analysis in the EIS includes the potential impacts of the proposed CISF, in light of the population distribution and demographics, employment and major industries in the area, housing availability and affordability, local tax revenue structure, and local services. The EIS will describe how the region of influence is determined. The EIS will also include a cost-benefit analysis; however, the NRC staff does not base its licensing decisions solely on the economic benefits or costs of a proposed project. See Section B.21 [Cost Considerations] of this report for more information on the scope of the cost-benefit analysis.

The EIS will analyze past, present, and reasonably foreseeable future events as part of the cumulative impacts analysis that may result in potential socioeconomic impacts within the socioeconomic region of influence, such as development of other proposed projects. However, a detailed analysis of how public perception could potentially influence other industries in the region is speculative and outside the scope of this EIS.

Comments: (1-2-6) (1-7-6) (3-1-4) (20-2) (52-3) (165-23) (508-3)

B.19 Comments Concerning Environmental Justice

B.19.1 Environmental Justice – Communities Along Transportation Routes

The NRC received comments that requested the EIS include an analysis of potential impacts on communities along transportation routes used for the shipment of SNF to the proposed CISF. Some commenters asserted that the transportation of SNF is an environmental justice concern. Commenters also stated that the transportation of SNF would disproportionately burden low-income communities and minority populations, including communities already impacted by environmental hazards. As part of these comments, some commenters also requested translations of the application documents and NRC-provided materials.

Response: The EIS will include an environmental justice analysis encompassing the vicinity of the proposed project, both in terms of community characteristics and potential impacts. However, an environmental justice analysis of the potential effects along every possible transportation route associated with this proposed CISF is outside the scope of this EIS. The scope of the environmental justice analysis is provided in other comment responses in this section of the scoping report. Information about requests for translation of project documents is in Section B.2 [NEPA Process – Public Participation] of this document.

Comments: (517-9) (518-2) (518-3) (518-4) (545-24)

B.19.2 Environmental Justice – EPA Scoping Comments on Environmental Justice

The EPA provided scoping comments and recommendations for the proposed CISF project related to environmental justice. The EPA noted that Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994), and the Interagency Memorandum of Understanding on Environmental Justice (August 4, 2011) apply to Federal reviews such as the NRC's EIS for ISP's proposed CISF. EPA recommended that the EIS include an evaluation of environmental justice populations within the geographic scope of the proposal and foster public participation by these populations if they exist. EPA's Promising Practice Report was recommended to supplement the applicable requirements for considering and analyzing environmental justice populations for the proposed project.

Response: Although the Executive Order 12898 (59 FR 7629) only requested rather than directed independent Federal agencies [44 U.S.C. §3502(5)], like the NRC, to comply with the Order, the NRC, in exercising its regulatory authority, acts in a manner consistent with the fundamental precepts expressed in the Order by adopting practices to ensure potential environmental justice impacts are evaluated in NRC environmental reviews. The NRC environmental justice analysis practices are described in the NRC's final policy statement on the Treatment of Environmental Justice Matters in NRC Regulatory and Licensing Actions (69 FR 52040).

The EIS will include NRC's methodology on evaluating environmental justice issues and a description of communities within the 80-km [50-mi] radius of influence (ROI). The EIS will also present the NRC's determination on whether the proposed action would result in disproportionately high and adverse human health and environmental impacts upon low-income or minority populations. Cumulative environmental justice impacts will also be addressed in the EIS.

The NRC is familiar with EPA's 2016 "Promising Practices for EJ Methodologies in NEPA Reviews" report and will consider the recommendations provided in the EPA report. Section B.2 [NEPA Process – Public Participation] of this report provides additional information on NRC's public participation process.

Comments: (16-8)

B.19.3 Environmental Justice – General Concerns

Many commenters expressed that the proposed project is a form of environmental injustice. Some commenters stated that the project is specifically targeting low-income and minority communities. Several commenters noted that the proposed project would disproportionately impact Hispanic communities. Others characterized the proposed project as environmental racism and disrespectful to American Indian Tribes. A number of commenters stated that it is unjust to locate a nuclear facility in the region because of the large Hispanic and American Indian populations that have suffered from past nuclear facilities and contaminated sites. Many commenters expressed the added concern that the proposed project would cause disproportionate and adverse health effects during the CISF operations and during transportation of SNF to the proposed CISF, and particularly through Tribal lands. Some commenters objected to the characterizations by other commenters that the population near the proposed project is an economically or educationally disadvantaged area or qualified as an environmental justice population. Several documents were provided by commenters for the NRC to review and consider.

Response: The EIS will include an analysis of environmental justice in the vicinity of the proposed CISF, consistent with Executive Order 12898 (59 FR 7629), Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, and the NRC's final Policy Statement on the Treatment of Environmental Justice Matters in NRC Regulatory and Licensing Actions (69 FR 52040).

The environmental justice section in the EIS will include NRC's methodology on evaluating environmental justice issues and a description of communities within the 80-km [50-mi] ROI of the proposed CISF. The EIS will also include the NRC's determination of whether the proposed action would result in disproportionately high and adverse human health and environmental effects upon low-income or minority populations. Cumulative environmental justice effects will also be addressed in the EIS. The EIS and NRC's safety evaluation will include an analysis of public and occupational health and safety to determine potential radiological and nonradiological impacts on workers and the public from operating the proposed CISF and to ensure compliance with NRC regulations. However, an environmental justice analysis of the potential effects along every possible transportation route associated with this proposed CISF is outside the scope of this EIS.

Comments: (1-11-2) (1-15-9) (1-18-16) (1-28-2) (1-28-5) (2-5-7) (2-9-4) (2-20-4) (2-22-5) (3-1-3) (3-1-5) (3-3-3) (3-3-6) (3-8-1) (3-8-4) (3-11-1) (3-13-4) (4-1-6) (4-1-7) (4-5-2) (4-17-1) (6-11) (20-1) (24-4) (27-6) (34-4) (58-3) (70-1) (75-3) (87-1) (87-3) (89-2) (95-2) (118-12) (134-22) (139-25) (140-3) (146-4) (146-10) (157-8) (164-17) (165-21) (191-2) (204-3) (265-3) (284-3) (342-1) (395-5) (410-3) (415-9) (441-3) (502-26) (511-4) (516-4) (523-4) (528-3) (531-3) (539-21) (539-22) (540-12) (557-10) (558-3) (558-4) (559-10) (566-7) (566-11) (566-12) (567-6) (568-1) (568-2) (571-7) (571-11) (573-1) (576-4) (620-9) (647-2) (655-1) (669-6) (686-1) (753-1) (804-2) (816-3) (819-35)

B.20 Comments Concerning Historic and Cultural Resources

B.20.1 Historic and Cultural Resources – Transportation Routes That Could Affect Historic and Cultural Resources

The NRC staff received a comment requesting that the EIS evaluate potential effects on culturally important sites, areas, or resources along transportation routes.

Response: The specific transportation routes that could be used to move SNF to the proposed ISP CISF have not been determined; additionally, NRC's licensing action (i.e., ISP's proposal to construct and operate the CISF) does not include approval of specific transportation routes.

Potential impacts on historic and cultural resources would be minimized by use of existing rail routes. Refurbishments of rail lines would likely require minimal ground disturbance or may require review by an appropriate governing body if more significant infrastructure projects are required. Thus, the NRC will not conduct a discrete analysis of impacts to historic or cultural sites along existing transportation routes from the transportation of SNF to the proposed CISF. Related comments concerning transportation accidents are addressed in another section of this scoping summary report, Section B.10 [Transportation of Spent Nuclear Fuel – Safety/Accidents].

In addition, through the Tribal Advance Notification program (77 FR 34194), American Indian Tribes that choose to receive advance notification of shipments of irradiated reactor fuel and certain nuclear wastes passing across their reservation are informed by the licensees in advance. Additional information about the NRC's Tribal Advance Notification program is available on the NRC's website at <https://www.nrc.gov/about-nrc/state-tribal/tribal-advance-notification.html>.

Comments: (540-15)

B.20.2 Historic and Cultural Resources – Treatment of Historic Properties, Cultural Resources, and Sacred Sites

The NRC staff received a comment that expressed concern regarding the treatment of historical and cultural resources as the result of the proposed action. Specifically, the commenter was concerned with the violation of the 1848 Treaty of Guadalupe Hidalgo, the availability of sacred natural resources used for religious practices, and increased radiation exposure pathways for indigenous peoples.

Response: The NRC staff has invited potentially affected Tribes that possess potential religious, spiritual, and cultural interest and ties to the geographic area where the proposed CISF would be located to consult in the NHPA Section 106 process during the NEPA review for this project. It is the NRC staff's goal to coordinate compliance with the Section 106 process through its NEPA environmental review process consistent with 36 CFR 800.8. The proposed CISF is an interim storage facility, which is a passive system that would not undertake any active processing of the SNF. The NRC's safety and environmental reviews will evaluate whether the proposed CISF would be in compliance with applicable U.S. laws and regulations, including any laws or regulations arising out of international agreements to which the U.S. is a party.

The EIS will include a characterization of cultural and historic properties in Chapter 3, Affected Environment; an assessment of potential impacts from the construction, operation, and decommissioning of the proposed CISF to cultural and historic properties in Chapter 4, Impact Analysis; and an assessment of potential cumulative impacts in Chapter 5, Cumulative Impacts. As part of this analysis, the NRC will coordinate with American Indian Tribes to identify cultural resources within the APE. Additional comments related to transportation routes that could affect historic and cultural resources are located in Section B.10 [Transportation of Spent Nuclear Fuel – Safety/Accidents].

Comments: (524-2)

B.21 Comments Concerning Cost Considerations

B.21.1 Cost Considerations – Estimating Costs

The NRC staff received comments regarding estimating the costs of the proposed CISF. Commenters requested that the cost-benefit analyses address the costs for transporting the SNF (both to and from the CISF), the costs of the CISF stages (e.g., construction and operation), and the costs for accidents at the CISF or during SNF transport. Some commenters stated that the cost-benefit analyses in the ER did not accurately or completely characterize the costs and benefits or demonstrate that the proposed action was an economically attractive option. Commenters also wanted the cost-benefit analyses to identify who pays for the routine costs, who pays for accident costs, and what mechanism or process is used so the licensee recovers costs from the Federal government. One commenter stated that the EIS should analyze the cumulative or comprehensive costs for storing SNF. Additional topics raised include characterizing the proposed CISF as a public subsidy and the accuracy of the description of the oil and gas industry.

Response: The EIS will include a cost-benefit analysis comparing the major costs and benefits associated with the proposed CISF in relation to the No-Action alternative. Costs not directly associated with the proposed action or alternatives (e.g., costs for building and constructing storage facilities other than the proposed ISP CISF) are beyond the scope of this EIS. Additionally, costs associated with alternatives not evaluated in detail will not be considered in the EIS. Comments related to the proposed CISF as a public subsidy are addressed in Section B.21.4 [Cost Considerations – Shifting the Responsibility for Storing SNF]. Comments related to the oil and gas industry are addressed in Section B.18.1 [Socioeconomics - Impact on Other Industries] and Section B.8 [Land Use].

Comments: (1-8-2) (55-2) (460-10) (491-7) (517-13) (527-5) (542-12) (778-2) (819-12)

B.21.2 Cost Considerations – Financial Responsibility for Facilities and Activities

The NRC staff received comments concerning who has responsibility for the costs of transporting the SNF, storing the SNF at the CISF, and decommissioning the CISF.

Response: The EIS will include a high-level comparison of the costs and benefits of the proposed CISF compared with the No-Action alternative. Topics such as costs of the construction, operation, and decommissioning of the facility and spent fuel transportation will be discussed in the EIS, as appropriate.

Comments: (3-18-4) (803-3)

B.21.3 Cost Considerations – General Comments

The NRC staff received comments about general costs and benefits of the proposed CISF. Some commenters stated that the financial benefits are outweighed by the costs such as negative impacts to public health and the environment. Some commenters questioned whether financial benefit would receive higher priority than safety. Some commenters considered the proposed CISF a waste of money and thought the money should be spent on other projects. Other additional issues raised included SNF transportation risk, accidents, and *de facto* disposal.

Response: As appropriate, the EIS will include a discussion of the costs and benefits of the proposed action (i.e., Phase 1) as well as a comparison of the proposed action and No-Action alternative. As described previously in Section A.3 of this report, expansion of the ISP proposed project (i.e., up to 8 phases) is not part of the proposed action. However, the NRC staff will consider these expansion phases in its description of the affected environment and impact determination where appropriate and when the environmental impacts of the potential future expansion were able to be determined, so as to conduct a bounding analysis for the proposed CISF project. Section A.3 also discusses that while the proposed action does not include a specific license for transportation of radioactive material or approval of specific transportation routes, the EIS will include a discussion of the impacts of transportation for representative shipments to and from the proposed facility. Because the EIS will describe the impacts to potential future expansions as well as the SNF transportation to and from the proposed CISF, the EIS cost-benefit chapter will also consider these two topics. Comments concerning SNF transportation risk are addressed in Section B.10 [Transportation of SNF – Safety/Accidents]. Comments concerning accidents are addressed in Section B.25 [Accidents]. Comments concerning *de facto* disposal are addressed in Section B.4.2 [Proposed Action – De Facto Disposal].

Comments: (1-22-5) (1-28-6) (2-17-1) (2-29-3) (2-34-2) (3-19-8) (11-4) (23-2) (41-1) (65-3) (69-2) (94-2) (107-1) (108-6) (108-11) (147-4) (163-9) (221-1) (399-2) (408-21) (408-26) (819 -4)

B.21.4 Cost Considerations – Shifting the Responsibility for Storing SNF

The NRC staff received comments concerning the shift in responsibility (e.g., cost, liability, or risk) for storing SNF that is associated with the proposed CISF. Commenters stated that the nuclear power utilities are seeking to shift the responsibility for storing SNF primarily to the Federal government while ISP profits. Some commenters characterized the proposed CISF as a public subsidy. Other commenters stated that the proposed CISF would expedite this shift in responsibilities by decades (i.e., prior to the availability of a geologic repository). While commenting on this shift in responsibility, commenters also raised the issue of liability.

Response: These comments raise issues that are likely outside the scope of the EIS, because the issues raised will likely not alter the environmental impacts of the project. Within the comments concerning the shift in responsibility, commenters also raised the issue of liability for accidents, which is addressed in Section B.21.6 of this report [Cost Considerations – Ownership or Title of the SNF].

Comments: (1-9-2) (1-9-6) (1-14-6) (2-5-6) (3-29-4) (28-20) (28-22) (144-2) (222-1) (408-23) (420-5) (528-12) (606-1) (717-1) (819-8) (819-10) (819-16)

B.21.5 Cost Considerations – Who Experiences the Costs and Benefits

The NRC staff received comments concerning who would receive the benefits compared to who would bear the costs. Some commenters stated that Andrews County or Texas would experience the benefits (e.g., tax revenue) while Lea County or New Mexico would experience the costs (both financial and environmental). Some commenters stated that the local community (e.g., Andrews County) would experience the benefits while those outside the local community (e.g., the rest of Texas) would experience the costs. In contrast, other commenters said that the costs would be experienced locally and the benefits would be experienced by others (e.g., those where the SNF is currently stored). Some commenters stated that the benefits would only be experienced by a few individuals who profit from the proposed CISF. One commenter stated that the NRC should ensure New Mexico receives economic value from the proposed CISF. Another commenter stated that the proposed CISF would not be subject to Lea County or New Mexico laws and restrictions. While providing comments on who experiences the costs and benefits, one commenter questioned the fairness to the local community that would bear the risk while not receiving fiscal benefits.

Response: In the EIS, the focus of the cost-benefit analyses will be from a societal perspective as opposed to the perspective of any particular individual, company, or industry. As appropriate, cost-benefit analyses will draw upon the other sections of the EIS that will characterize the baseline conditions and analyze the potential impacts from the proposed CISF across a wide range of environmental resources, including socioeconomics, transportation, and public and occupational health. This characterization of baseline conditions and potential impacts within the individual resources areas provides information concerning where the potential impacts occur and who experiences them. The NRC staff does not have the authority to require or ensure that New Mexico receives economic value for a proposed CISF located in Texas adjacent to the New Mexico border. Ensuring or requiring community compensation from a proposed CISF is outside the scope of this EIS; therefore, the EIS will not address this topic. The EIS will identify Federal, State, and local regulations and requirements applicable to the proposed CISF. The scope of the EIS with respect to the fairness to the local community hosting the proposed CISF is addressed in Section B.28.1 [General Opposition – General Comments] and Section B.6.4 [Assumptions – Legal Framework of the Proposed CISF].

Comments: (1-2-2) (1-5-5) (1-5-6) (1-6-2) (1-17-1) (2-3-1) (3-3-8) (3-16-8) (18-4) (113-3) (114-2) (200-1) (264-7) (566-2)

B.21.6 Cost Considerations – Ownership or Title of the SNF

The NRC staff received numerous comments regarding the ownership of the fuel and liability associated with the proposed action. Commenters questioned the title (i.e., ownership) of the fuel, the financial and legal liability of a private entity transporting fuel, and the financial and legal liability associated with the construction, operation, and decommissioning of the proposed CISF. Commenters were specifically concerned about the financial liability due to accidents, contamination, denial of homeowners insurance, and change in ownership of the proposed CISF. Some commenters questioned the applicability of the Price-Anderson Act (i.e., who is liable for SNF).

Response: In conjunction with the safety analysis documented in the NRC's SER, the EIS will analyze potential environmental impacts from credible radiological accidents at the proposed CISF. Transportation of SNF and the liability for accidents is covered by the Price-Anderson Act. The issue of who has title to and liability for SNF is likely outside the scope of the EIS.

Comments: (1-16-5) (2-11-3) (2-13-7) (2-20-6) (2-22-10) (3-5-11) (3-6-5) (3-6-6) (3-16-9) (3-18-2) (3-26-3) (4-3-4) (4-22-1) (165-7) (165-10) (216-2) (339-3) (339-11) (422-2) (476-3) (502-13) (508-2) (525-6) (539-18) (545-10) (558-8) (598-3) (755-1) (781-4) (819-13)

B.22 Comments Concerning Radiological Health

B.22.1 Radiological Health – Cancer Risk

The NRC staff received a comment expressing concerns about radiation exposure and cancer risk. The commenter was concerned about cancer risks from low-dose radiation, such as when a transportation shipment of SNF passes through a community.

Response: The EIS will address potential public and occupational radiation doses and associated health effects for the proposed storage and transportation activities. This may include estimates of individual and collective doses and cancer risks, where appropriate. The NRC dose limits incorporate conservative assumptions and are considered protective of workers and the public. Related comments are described in Section B.22.6 [Radiological Health – Radiological Impact Analysis Approach].

Comments: (4-28-1)

B.22.2 Radiological Health – Characteristics of the Material That Would Be Stored

The NRC received comments requesting that the EIS take into account the characteristics of the material that would be stored, including the waste form, the dose rate from storage systems, and the long half-life of the material.

Response: The EIS will consider the characteristics of the material that would be stored at the proposed CISF and other forms of low-level radioactive waste that would be generated by the facility, and how these materials would potentially impact the environment. This includes, but is not limited to, the waste form, canister inventory, dose rate, and long half-life of the material.

Comments: (1-12-3) (2-10-3) (444-4) (468-2)

B.22.3 Radiological Health – General Concerns

The NRC staff received comments that expressed general concerns about radiological health and safety. Concerns were expressed generally about health, safety, the environment, hazards, contamination, transport and exposure pathways, decay/ingrowth, long half-lives of radionuclides in SNF, potential contamination of dairies and farms, ranching, impacts on livelihoods, downwinders from nuclear fallout, repeating nuclear problems of the past, cancer, and birth defects. Concerns were expressed about increases in cancers in the area and for child safety and risks to the unborn.

Response: The EIS will consider the potential radiological health and safety impacts to workers and the public from the proposed CISF project. Under normal operating conditions, dry cask storage of canistered SNF does not release radioactive materials into the environment; therefore, the radiological impact analyses applicable to normal operations will evaluate radiation dose estimates to workers and the public from the direct radiation typically emitted from the canisters and shielded casks. The potential impacts of credible accidents from the proposed dry cask storage will be considered in the EIS. If credible accidents from the

proposed dry cask storage involving a release of radioactive material are identified, then any exposure pathways that significantly contribute to dose estimates would be considered along with the potentially affected area and related environmental impacts. The specific exposure pathways addressed would depend on the circumstances of the accident scenario analyzed, which will be determined during the NRC staff's licensing review. The general concerns raised by commenters overlap with more detailed comments about radiological health and safety that are described in the remainder of the responses in this section and are therefore not repeated here.

The NRC will also conduct, in parallel with the EIS, a detailed safety review that will evaluate compliance with all applicable NRC safety regulations and document the results of that review in a SER. The NRC will consider the impacts identified in the EIS and the regulatory compliance determinations in the SER in making a decision whether to grant a license to ISP for the proposed CISF. Comments about transportation safety and accidents are described in Section B.10 [Transportation Safety/Accidents].

Comments: (1-18-11) (1-22-1) (3-3-4) (7-2) (45-7) (95-4) (99-14) (115-5) (116-3) (215-1) (220-26) (241-1) (264-4) (324-3) (324-8) (396-1) (410-2) (412-6) (420-4) (477-1) (620-2) (815-4)

B.22.4 Radiological Health – Health Effects of Radiation Exposure

The NRC staff received comments related to the health effects of radiation exposure. Several commenters suggested that there is no safe level of radiation exposure and thus any exposure leads to cancers, birth defects, and death. Another commenter provided extensive discussion on there being damage to cell membranes at any dose.

Response: The EIS will be based on the best available information and established science regarding the potential health effects of radiation exposure. Therefore, the EIS will not involve conducting basic research on the potential health effects of radiation exposure. For impacts involving risk, the NRC staff considers the probability of occurrence and consequence in determining significance. The presentation of non-probability-weighted consequences may also be used when it contributes to the clear description of potential impacts. Additionally, the NRC safety staff will review the license application to evaluate compliance with NRC regulations, which are protective of health and safety. Any regulations that are important to the NRC staff's environmental impact determinations in the EIS will be described, as appropriate. Comments about cancer risk are addressed separately in this section [Radiological Health] of this report.

Comments: (1-36-3) (3-3-5) (164-14) (230-1) (230-2) (395-4) (398-4) (415-1) (522-7) (795-2) (800-1)

B.22.5 Radiological Health – NRC Safety Regulations and Level of Protection

The NRC staff received comments about NRC regulations and the associated level of protection. Commenters expressed concerns about the risk of cancer and genetic effects associated with current regulatory limits, and expressed that there is no safe limit of radiation exposure. Another commenter suggested that uncertainties and lack of consensus about radiation exposure limits has led to compromises in setting standards that are unsafe.

Response: Regulations pertaining to radiological exposure and standards (i) are established by following a public rulemaking process, (ii) reflect extensive scientific study by national and international standard-setting organizations, and (iii) incorporate conservative assumptions and

models. Regulations provide assurance that radiation exposures associated with the possession, use, and transfer of radioactive materials will be maintained well below established levels of concern for health effects. Where regulations are cited in the EIS impact determinations, the EIS will provide clear descriptions of how compliance with cited regulations addresses the specific impacts being evaluated. Comments about transportation safety are described in Section B.10 [Transportation Safety/Accidents].

Comments: (28-8) (163-3) (264-3) (702-1)

B.22.6 Radiological Health – Radiological Impact Analysis Approach

The NRC staff received several comments related to the impact analysis methods that the NRC would use to estimate radiological impacts from normal operations or accidents. One commenter suggested that an epidemiological study should be performed. Another commenter favored reporting individual radiation doses rather than collective population doses. Some commenters suggested the NRC revise or redefine typical radiological assessment terminology, such as collective dose.

Response: The EIS will evaluate potential radiological impacts of normal operations and credible accidents from the construction and operation of the proposed CISF project using generally accepted radiological assessment methods that are consistent with applicable NRC practices, regulations, and guidance. The EIS analyses will consider the applicable locations of potentially exposed individuals and routes of exposure to radiation that would contribute significantly to dose estimates. Impact analyses will include both quantitative and qualitative considerations. Radiation dose estimates will typically be reported as individual annual doses consistent with NRC safety standards in 10 CFR Part 20, although collective doses would be used to estimate health effects to populations. The EIS will, as necessary, describe and consider the general health conditions of the affected environment. The EIS will not include detailed assessments of existing health conditions of the region but will rely on available scientific methods and health information.

Under normal operating conditions, dry cask storage of canistered SNF does not release radioactive materials into the environment; therefore, the radiological impact analyses applicable to normal operations will evaluate radiation dose estimates to workers and the public from the direct radiation typically emitted from the canisters and shielded casks. The potential impacts of credible accidents from the proposed dry cask storage will be considered in the EIS. If credible accidents from the proposed dry cask storage involving a release of radioactive material are identified, then the NRC staff would consider the potentially affected area, any exposure pathways that significantly contribute to dose estimates, and any related environmental impacts. The specific exposure pathways addressed would depend on the circumstances of the accident scenario analyzed, which will be determined during the staff's licensing review.

Comments: (461-6) (539-10) (781-2) (819-21)

B.22.7 Radiological Health – Radiological Safety of Workers

The NRC staff received a comment expressing radiological safety concerns for workers. The commenter was concerned about worker exposure data being available to the public.

Response: The EIS will evaluate the potential health and safety impacts to workers, including consideration of both radiological and nonradiological hazards. This will include consideration of dose estimates for proposed operations and activities, including credible accident scenarios, but may also consider historical experience with similar operations. The EIS will also consider available nonradiological safety information related to similar activities or industries (e.g., Occupational Safety and Health Administration reports). Regarding the availability of worker exposure data, under 10 CFR 20.2206, the NRC requires licensees to submit an annual report of the results of individual monitoring carried out by the licensee for each individual for whom monitoring was required by 10 CFR 20.1502 during that year. Annually, the NRC publishes a volume of the results of annual reporting of all licensees in the publicly available NUREG-0713 (NRC, 2018).

Comments: (4-8-2)

B.23 Comments Concerning Waste Management

B.23.1 Waste Management – General Comments

The NRC staff received comments regarding the evaluation of non-HLW management impacts. A commenter requested estimates of LLRW volumes, including the contribution from waste concrete due to neutron activation during decommissioning of the proposed CISF and used canisters if the SNF is stored beyond the license term. A commenter asserted that SNF has chemical constituents that would classify it as hazardous waste that would require a Resource Conservation and Recovery Act (RCRA) permit.

Response: The EIS will include an analysis of the potential impacts to waste management from the construction, operation, and decommissioning of the proposed CISF. This analysis will include descriptions of the nonradiological and radiological waste streams produced by the proposed action, the applicant's proposed waste management activities, and the applicable regulations that address handling, storage, and disposal of these wastes. As applicable, required permits related to waste management for the proposed action also will be discussed.

Comments: (517-6) (517-8) (819-41)

B.24 Comments Concerning Cumulative Impacts

B.24.1 Cumulative Impact – Resource Specific

The NRC staff received several comments on the cumulative impact of the proposed CISF with nearby energy and mineral activities as well as water resources. Specifically, commenters expressed concern about the potential impacts on key industries, including oil and gas production and potash mining. Topics of concern identified by commenters included water quality, air quality, and disposal of wastewater by injection wells, traffic levels, and road and railroad infrastructure. While providing comments on resources, one commenter also requested that the EIS analyze the combined effects of the existing WCS site.

Response: The EIS will provide a cumulative impacts evaluation, which will include the impacts of construction, operation, and decommissioning of the proposed CISF combined with the impacts of other past, present, and reasonably foreseeable future actions. The cumulative impacts analysis will consider historic, current, and future trends in mining and energy-related activities, and other Federal projects in west Texas and southeast New Mexico as they relate to

the proposed CISF. Facilities that are not yet reasonably foreseeable (i.e., speculative) are outside the scope of this EIS.

Comments: (3-5-4) (10-2) (11-2) (23-3) (43-3) (43-5) (65-2) (104-2) (139-20) (161-5) (171-9) (213-2) (408-16) (584-1) (740-3)

B.24.2 Cumulative Impacts – Cumulative Contaminant Exposures

The NRC staff received several comments expressing concerns regarding cumulative impacts to human health and the environment that might result from the addition of the proposed CISF to the existing conditions in the area. As a result of the activities and facilities in the area of the proposed CISF, commenters requested assessments of potential impacts to (i) the human life cycle, (ii) the environment, and (iii) the facilities themselves.

Response: The cumulative impact section of the EIS, as required under NEPA, will provide an analysis of cumulative impacts of other past, present, and reasonably foreseeable future actions, including, where appropriate, the presence of other industrial facilities in the region. The EIS will include consideration of existing air emissions sources and background pollutant concentrations and cumulative effects on members of the public due to the presence of radioactive materials, including those that would be present at the proposed CISF, and other known sources of radiation and pollution. An analysis of facilities that pose environmental risks from activities that are not associated with the proposed CISF (i.e., the proposed CISF does not contribute to the environmental risks) is outside the scope of the EIS.

Comments: (143-1) (412-14) (502-5)

B.24.3 Cumulative Impacts – General Comments

The NRC staff received comments stating that cumulative impacts need to be considered.

Response: The EIS will include a cumulative impact analysis within the region of the proposed CISF. The cumulative impacts analysis will include descriptive information and impact determinations for all resource areas, accounting for past, present, and reasonably foreseeable future actions.

Comments: (4-9-8) (4-14-9)

B.24.4 Cumulative Impacts – Nearby Facilities, Including the Existing WCS Site

The NRC staff received several comments regarding the potential combined effects of the proposed CISF and other nearby known facilities and legacy sites throughout the State and in the vicinity of the proposed project. Topics raised by commenters included both radiological and nonradiological impacts under normal conditions as well as accidents. One commenter requested that the EIS consider the worst possible scenarios. Several commenters raised the issue of cumulative radiological exposures from transportation of material to the various facilities. Other commenters expressed concerns over past impacts from the WCS site. Other facilities identified by the commenters included Waste Isolation Pilot Plant (WIPP), URENCO, the municipal landfill, and the proposed CISF in Lea County, New Mexico. While providing comments on cumulative impacts from nearby facilities, commenters raised the issue of terrorism.

Response: The EIS analysis will describe the cumulative impacts of past, present, and reasonably foreseeable future actions within an 80-km [50-mi] ROI around the proposed project area. Similar to the analysis that will be conducted as part of the direct and indirect environmental impacts of the proposed CISF, the EIS will also evaluate potential impacts of normal operations and credible accidents within its cumulative analysis. Information from the NRC safety review will be incorporated into the EIS, as needed. Similar comments about the scope of the EIS's safety and accident analyses at the proposed CISF and at other nearby facilities are addressed in Sections B.26 [Safety] and B.25 [Accidents] of this report. Similar comments about the scope of the EIS's safety and accident analyses during transportation of SNF are addressed in Section B.10 [Transportation of Spent Nuclear Fuel – Safety/Accidents]. Comments related to terrorism are addressed in Section B.30.8 [Out of Scope –Security and Terrorism].

Comments: (1-13-8) (1-17-9) (1-21-4) (1-32-3) (2-7-3) (2-8-8) (2-13-1) (2-13-10) (2-14-2) (3-1-2) (3-8-2) (3-9-1) (3-9-4) (4-14-4) (4-18-6) (5-5) (6-5) (30-10) (30-15) (40-5) (99-7) (99-18) (102-2) (108-5) (134-7) (134-18) (134-19) (140-7) (149-1) (157-7) (161-8) (165-20) (171-6) (174-8) (220-12) (220-18) (339-8) (502-9) (502-19) (511-8) (528-8) (538-1) (539-11) (554-7) (559-13) (570-16) (819-25) (819-28)

B.24.5 Cumulative Impacts – Objection to Siting the CISF at the Proposed Location

The NRC staff received comments regarding locating the proposed CISF in west Texas along the border of Southeastern New Mexico because of other existing facilities, waste storage sites, and activities. The commenters generally expressed concern about cumulative effects from past and present facilities and activities, and that they do not want the communities in this area to continue to be burdened with the addition of more nuclear waste from the proposed CISF.

Response: For the purpose of analyzing this proposed action, which is a site-specific CISF for SNF, the NRC will consider and evaluate the cumulative impacts that could occur from the incremental impact of the proposed CISF when added to past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or entity undertakes these actions. NEPA does not require analysis of worst-case scenarios. The NRC will establish and specify a region over which cumulative impacts could be expected to occur. The NRC staff will rely on the information gathered from the NRC scoping process, the environmental and safety reviews, and independently gathered information to assess the reasonably foreseeable future actions that could occur.

Comments: (134-20) (139-15) (437-1) (816-5) (819-37)

B.25 Comments Concerning Accidents

B.25.1 Concerns About Accidents

The NRC staff received a large number of comments expressing concerns about various CISF accident scenarios and their potential consequences. Commenters expressed concerns about accidents during all project phases, alluding to past incidents at foreign and domestic nuclear power plants (e.g., Chernobyl, Fukushima, Three Mile Island) and other sites (e.g., WIPP and Los Alamos). Some commenters suggested that the EIS evaluate beyond-design-basis and worst-case accidents. Commenters expressed different opinions about the likelihood, severity, and potential consequences of accidents at the proposed CISF.

Some commenters described concerns regarding various potential accident initiators, including extreme weather events (e.g., tornadoes, high temperatures, lightning, and flooding) and other natural events, such as wildfires, land subsidence, and sinkholes. Additional events such as explosions, criticality, sabotage, aircraft crashes including fuel fire, and decommissioning accidents were also mentioned. Some commenters questioned the capabilities of the storage casks to perform safety functions such as cooling and containment throughout the period of operations without an accident. Some commenters wanted to know about the region of influence for the impacts of accidents and the types of models that would be used to evaluate accidents.

Concerns expressed about the consequences of accidents included the dispersion and distribution of radioactive materials, the size of the affected area, and the potential economic impacts on local businesses, the State budget, natural resources (including soil, air, water supply, and wildlife), and potential impacts of accidents on responders, workers, and the public, including the potential for genetic effects. Additional concerns were expressed about accident mitigation, including suggestions about additional design features to protect against aircraft crash and similar hazards. Other mitigation concerns were focused on prompt reporting of accidents to the public, the availability of workers to respond to accidents, monitoring casks, repair, replacement, and decontamination and decommissioning.

Response: The NRC safety regulations and guidance specify that the proposed facility be designed to withstand various credible accidents, including natural external events. The NRC SER will include an evaluation and determination of (i) the adequacy of the design to withstand credible accidents, (ii) the potential for a release of radioactive material to occur as a result of any such accident, and (iii) the significance of any such release. In conjunction with the safety analysis documented in the NRC's SER, the EIS will analyze the potential environmental impacts resulting from credible accidents at the proposed CISF. NEPA does not require analysis of worst-case scenarios. Comments about emergency response and emergency management are described in Section B.27 [Emergency Management]. Comments about transportation accidents are addressed in Section B.10 [Transportation Safety/Accidents]. Comments about security and terrorism are addressed in Section B.30.8 [Out of Scope – Security and Terrorism]. Comments about safety are addressed in Section B.26 [Safety].

Comments: (1-15-2) (1-18-13) (2-31-1) (3-8-3) (3-33-1) (4-10-1) (4-23-4) (14-7) (30-17) (61-3) (93-6) (98-6) (99-17) (101-4) (109-3) (117-3) (118-2) (118-3) (124-3) (139-18) (140-5) (143-4) (157-2) (157-5) (168-3) (171-7) (173-5) (174-6) (174-9) (209-1) (220-10) (220-21) (341-2) (372-1) (375-1) (406-3) (410-4) (415-8) (460-6) (462-7) (470-8) (476-10) (477-2) (502-7) (502-16) (522-6) (540-10) (557-1) (559-7) (559-8) (559-16) (564-2) (564-5) (566-9) (571-5) (576-6) (589-5) (620-8) (687-1) (694-2) (700-1) (804-3) (819-34)

B.26 Comments Concerning Safety

B.26.1 Safety – Cask System Design

The NRC staff received comments regarding the safety of the cask system design that would be used to store SNF at the proposed CISF. Commenters expressed safety concerns or reasons for not being concerned about specific design features and initiating events and processes that some believe could affect safety functions of cask systems. Commenters also commented about the rigor and real-world applicability of testing during the certification reviews of cask systems, including transportation casks.

Design features of interest to commenters included the thickness of casks and canisters, the placement of casks, vents, the solid form of the waste, welded and sealed canister design, the confinement boundary, design life, service life, and license term. Initiating events and processes described by commenters included the potential for cracks and loss of containment, the potential for hydrogen generation, the resiliency to sabotage, the possibility of infilling of cask or canister with water, the effects of environmental temperature, radiation degradation of materials, and potential corrosion initiators such as potash dust. Additional concerns were expressed about criticality, as well as various natural events or conditions such as earthquakes, flash flooding, lightning strikes, extreme desert climate, wind, fire, and geology.

Response: Concerns about the NRC's safety programs, the safety evaluation being conducted as part of this licensing action, and the certification of cask systems for storage and transportation, are outside the scope of the EIS. The impacts of credible events on the safe storage of SNF at the proposed CISF will be evaluated as part of the NRC staff's safety review, and the results will be documented in the SER. The EIS will consider the potential environmental impacts of storage and transportation of SNF. Additional details regarding NRC certifications are described in the response to comments about canister design in this section [Safety]. Other comment responses in this section also describe comments about cask system safety reviews and certifications. Comments about accidents are described in Section B.25 [Accidents].

Comments: (1-9-5) (1-15-8) (1-25-2) (1-35-4) (3-16-11) (3-16-12) (4-1-1) (4-17-3) (6-12) (28-3) (30-12) (118-13) (140-11) (165-33) (339-4) (342-2) (408-15) (408-19) (408-27) (420-7) (460-7) (460-13) (492-1) (502-15) (502-27) (505-6) (511-17) (527-2) (527-6) (545-7) (545-23) (554-4) (557-8) (559-15) (564-1) (570-17) (571-9) (571-14) (589-4) (819-48)

B.26.2 Safety – Canister Design

The NRC staff received comments expressing concerns about the safety of the proposed canister design for storing SNF at the proposed CISF. These concerns included comments about cask and canister designs, cask testing, degradation and aging management, and practical operational details.

Canister design concerns addressed a variety of topics, including the thickness of canisters and casks, basket performance, water intrusion, and the design life of casks and canisters relative to the proposed license term. Other comments expressed concerns about long-term quality assurance and inspection, loss of institutional control, and the viability of canisters and fuel for post-storage transportation.

Concerns were expressed about the ability to inspect, monitor, retrieve, and repair the proposed welded SNF canister. Some commenters expressed concerns about technical challenges regarding monitoring for cracks in canisters during storage. Concerns were expressed about how damaged casks, canisters, or fuel would be handled upon arrival and how casks or canisters that did not meet proposed storage facility acceptance criteria would be safely returned to the sender. Some wanted to know how a compromised cask would be removed from service. Additional concerns were expressed about the transportation accident probability and consequences and miscellaneous site-specific issues. Some expressed concerns about optimistic assumptions regarding the performance of safety systems.

Response: Concerns about the NRC's safety programs, the safety evaluation being conducted as part of this licensing action, and the certification of canisters and cask systems for storage

and transportation are outside the scope of the EIS. In parallel with this environmental review of the proposed CISF, the NRC is conducting a separate safety review. The safety review of the ISP application evaluates whether the application complies with applicable requirements, including 10 CFR Part 72, which addresses facility design, quality assurance, records, reports, inspection, and enforcement. While the NRC environmental review will not duplicate detailed safety evaluations, the EIS impact analyses will consider the potential impacts to workers, the public, and the environment from the proposed CISF. Comments about transportation safety and accidents are described in Section B.10 [Transportation Safety/Accidents] and transportation infrastructure in Section B.9 [Transportation Infrastructure]. Comments about institutional controls are described in Section B.6 [Assumptions].

Comments: (3-12-1) (3-12-5) (3-21-1) (4-6-1) (4-6-2) (4-7-1) (4-9-9) (4-19-2) (4-21-4) (4-29-1) (118-7) (118-17) (165-12) (165-18) (412-9) (412-16) (461-3) (461-4) (461-5) (476-12) (505-2) (519-4) (519-6) (519-7) (522-12) (523-12) (528-5) (548-6) (570-10) (575-5) (819-30)

B.26.3 Safety – Compliance with Safety Requirements

The NRC staff received comments requesting that the EIS include a review of the WCS project's current and past safety record.

Response: Detailed descriptions of compliance with NRC or agreement state safety regulations is outside the scope of the EIS. For example, the existing WCS LLRW disposal facility is regulated by TCEQ under authority relinquished by the NRC to the State of Texas under the NRC agreement state program (<https://www.nrc.gov/about-nrc/state-tribal/agreement-states.html>). As part of its review of the ISP license application, the NRC conducts an environmental review that results in an EIS and a safety review that results in a SER. The SER documents whether the application complies with the applicable NRC safety regulations. Any regulations that are important to the NRC staff's environmental impact determinations in the EIS will be described, as appropriate.

Comments: (4-9-1) (76-5) (127-1) (127-5) (142-3) (143-5) (335-1)

B.26.4 Safety – General Safety Concerns

The NRC staff received comments expressing general concerns about the safety of storing SNF and the proposed CISF. These concerns included a variety of general comments asserting that the facility would or would not be safe.

Response: The safe storage of SNF at the proposed CISF is considered in the NRC's safety review and is not within the scope of the environmental review. The results of the safety review can be found in the SER and will be incorporated as appropriate into the EIS. The NRC staff will consider the impacts identified in the EIS and the regulatory compliance determinations in the SER in making a decision on whether to grant a license to ISP for the proposed CISF.

Comments: (1-1-2) (1-13-1) (1-14-7) (1-18-12) (1-19-4) (1-28-1) (1-28-4) (1-31-2) (1-31-3) (2-4-2) (2-9-3) (2-10-1) (2-12-1) (2-13-5) (2-18-2) (2-23-4) (2-27-2) (3-7-5) (4-16-2) (4-23-1) (4-24-5) (27-2) (30-14) (30-18) (38-6) (40-7) (40-9) (43-4) (44-1) (59-4) (60-1) (68-1) (68-4) (88-2) (88-6) (93-2) (94-1) (99-9) (99-11) (103-3) (108-3) (118-15) (129-1) (132-3) (142-1) (153-3) (155-2) (157-3) (163-8) (171-3) (171-5) (174-2) (174-7) (186-1) (188-1) (191-3) (209-2) (213-1) (217-1) (220-14) (220-16) (253-1) (276-1) (293-1) (296-3) (299-1) (365-1) (365-3) (408-11) (415-10) (420-2) (470-1) (490-1) (490-4) (502-8) (519-2) (535-3) (546-5) (557-4)

(561-3) (564-6) (574-1) (576-9) (577-1) (591-5) (595-6) (620-11) (663-1) (669-3) (695-1) (735-1) (809-1)

B.26.5 Safety – Long-Term Safety of Stored SNF

The NRC staff received comments about the long-term safety of storing SNF at the proposed CISF. Some commenters were concerned about the long-term impacts of storing high-burnup SNF at the proposed CISF, including concerns about the integrity of SNF cladding over time. Commenters expressed concerns about storage lasting well beyond the initial license term.

Response: The timeframe for evaluation of the proposed action in the EIS is 40 years. This time period encompasses construction and operation of the proposed CISF in an initial license term. The Continued Storage GEIS, which will be incorporated into this EIS by reference per the regulation at 10 CFR 51.23(b), contains the analysis of storage of SNF during the period following the initial license term of the facility. Additional comments about long-term storage are described in Section B.4.2 [Proposed Action – De Facto Disposal]. Additional comments about the safety of high-burnup SNF are described in B.30.14 [Out of Scope – Storage and Transportation of High-Burnup SNF].

Comments: (1-16-6) (1-18-9) (2-7-1) (2-8-4) (2-14-4) (3-29-6) (4-14-3) (28-13) (71-6) (75-4) (139-4) (264-6) (264-10) (318-3) (407-2) (407-4) (412-15) (460-5) (702-3)

B.26.6 Safety – SNF Handling Capabilities

The NRC staff received comments regarding the lack of capabilities at the proposed CISF for handling unshielded SNF in the event of receipt of damaged SNF or SNF canisters. Some commenters stated that the approach of sending damaged or otherwise out-of-compliance (with NRC acceptance criteria) canisters that arrive at the proposed CISF back to the origin sites would present additional safety hazards.

Response: The applicant is not proposing having any SNF handling capabilities. All SNF will be received in transportable storage system canisters arriving to the site in approved transportation packaging.

The adequacy of the proposed canister handling capabilities and the applicant's proposed acceptance criteria policy will be evaluated as part of the NRC safety review. The applicant's acceptance criteria policy is expected by NRC staff to establish criteria that would be used by the licensee to evaluate the condition of canisters that are shipped to and received at the proposed CISF to determine whether the canisters can be accepted for storage and would include procedures for addressing canisters that do not satisfy the acceptance criteria. The NRC will consider both the safety and environmental reviews in reaching a final determination on whether to grant the license, and where applicable and appropriate, environmental impact conclusions in the EIS will rely on satisfactory compliance with NRC safety regulations.

Comments: (1-13-5) (2-10-4) (3-12-3) (3-14-1) (3-16-3) (6-9) (28-24) (30-16) (98-3) (99-12) (140-8) (220-17) (220-22) (339-9) (502-4) (502-24) (505-3) (511-14) (517-7) (539-7) (554-8) (559-18)

B.27 Comments Concerning Emergency Management

B.27.1 Emergency Management – Emergency Response for Transportation Accidents

The NRC staff received comments about emergency management for the transportation of SNF to and from the proposed CISF. Commenters requested an analysis of the level of emergency preparedness along likely shipping routes. Commenters expressed their concern that an adequate contingency plan is not provided for the containment of a radioactive spill or mishap, especially in sparsely populated areas. Commenters also noted the need for funding and training personnel teams so that response teams could respond quickly if SNF is involved in an accident. One commenter asked what plans are in place for acts of terror once SNF arrives at the proposed CISF.

Response: The adequacy of the Federal, State, and local emergency response capabilities and plans applicable to potential radiological incidents during transportation of SNF is addressed as part of broad emergency response planning efforts that are outside the scope of the EIS. The EIS will evaluate the risks of potential transportation accidents. General emergency response roles, responsibilities, and plans for potential SNF transportation incidents may be summarized in the EIS to provide context for the analysis of potential transportation impacts in the EIS, but would not be evaluated. Responses to scoping comments in Section B.10 [Transportation of Spent Nuclear Fuel – Safety/Accidents] address security and safeguards for transportation of SNF.

Comments: (96-4) (149-4) (165-25) (328-1) (335-6) (400-3) (422-1) (511-18) (539-20) (580-5) (595-4) (645-6) (666-1) (671-2) (672-1)

B.27.2 Emergency Management – Emergency Response Plan and Emergency Responders for the Proposed CISF

The NRC staff received comments regarding the roles and responsibilities of the first responders for the proposed project, and about emergency plans and disclosure of those plans. Some commenters raised concerns that local communities are not sufficiently equipped to respond to an accident that involves radiological materials. Other commenters expressed their concern that volunteer departments also may not be able to respond in a timely manner. Some commenters stated that responding to emergencies would be a financial burden on Lea County and other communities in New Mexico, where the closest first responders to the proposed CISF are located. A commenter provided recommended best practices for the NRC to consider.

Response: The adequacy of the applicant's emergency plan is part of the NRC's safety review and is outside the scope of the EIS. Additionally, the adequacy of the local emergency response capabilities and plans applicable to potential radiological incidents during transportation of SNF is addressed as part of broad emergency response planning efforts that are outside the scope of the EIS. As described in Section B.25 [Accidents], the EIS will evaluate the potential environmental impacts of credible accident scenarios.

Comments: (1-1-1) (1-2-1) (1-3-2) (1-4-1) (1-6-3) (1-14-10) (1-24-1) (2-22-8) (3-16-6) (4-3-2) (4-9-2) (4-15-1) (4-15-2) (66-3) (173-6) (204-2) (351-1) (412-7) (415-11) (476-9) (505-10) (540-14) (559-9) (571-3) (576-7) (620-12) (626-2) (673-3) (819-38)

B.27.3 Emergency Management – Environmental Monitoring

The NRC staff received several comments about environmental monitoring of the facility and of the transport casks. Commenters stated that SNF must be monitored frequently so that adverse conditions are immediately identified and corrected. Commenters stated that there needs to be real-time (24 hours a day, 7 days a week) monitoring and reporting of canister performance. Other commenters stated that the EIS must include how the proposed CISF will be monitored for radiation, toxic, and hazardous releases to the soil, air, and water. Other commenters stated that SNF handlers at the proposed CISF and along transportation routes should be required to monitor radioactive emissions, and that this data should be made publicly available at all times. Some commenters stated that in-depth research must examine radiation monitoring and that the EIS should study locations for stationary dosimeters along shipping routes. Other commenters expressed concerns about environmental monitoring. One commenter stated that current monitoring at the WCS site meets only minimum standards and that increased radiation, air, soil, and groundwater monitoring at the site and within surrounding areas of Eunice and Andrews should be required for the proposed CISF. Commenters expressed concerns about radiation monitoring at the fence line. These commenters stated that rather than publishing this data in an annual environmental report, this data should be collected in real-time and made available to the public to document radiation spikes that could occur in the event of a broken cask or an accident. One commenter wanted to know if there would be daily, monthly, or quarterly inspections to ensure full compliance by the facility. Commenters stated that the EIS should include plans for independent monitoring by the states of Texas and New Mexico. Another commenter stated that the EIS should address the status of radiation monitoring locations within a 644-km (400-mi) radius of the proposed CISF, the isotopes monitored, and the down-time history of each monitoring location. The commenter also wanted to know if these monitoring locations would have to be updated to detect a broader range of isotopes and who would pay for this.

Response: The NRC SER will evaluate the radiological monitoring program for the proposed CISF and will document specific radiological monitoring license conditions deemed necessary to ensure public and occupational health and safety, and the EIS will incorporate this information, as appropriate. The EIS will rely primarily on existing NRC requirements for radiological monitoring and reporting programs to support conclusions concerning environmental impacts. The EIS will take into account any required environmental monitoring by the states of Texas and New Mexico in its analysis of environmental impacts.

Comments: (3-17-4) (4-8-1) (4-18-4) (4-28-2) (7-3) (30-9) (40-4) (99-6) (139-21) (173-7) (174-5) (220-11) (301-1) (412-5) (476-11) (519-9) (559-12) (576-8) (713-2)

B.28 Comments of General Opposition

B.28.1 General Opposition – General Comments

The NRC staff received many comments through email, letter, regulations.gov, and at public meetings expressing opposition to the proposed ISP CISF. Some comments simply stated opposition (including statements of non-consent) to the construction and operation of the project or to transportation of nuclear waste. Other commenters cited general concerns regarding safety and accidents, concern for future generations, or the potential for exposure to radiation or environmental contamination. Some commenters cited their concerns with the lack of an existing repository; other current or legacy nuclear projects (e.g., uranium mining, weapons testing, and WIPP); or past nuclear accidents in the world. Many comments expressed concern

that a temporary storage facility is not a solution to the nuclear waste problem or that there is no definite path forward for a solution, and that the proposed ISP CISF is likely to become permanent. As part of their statements, some comments also called for a cessation of nuclear power. Other commenters stated general concerns about the site suitability. Some of the comments cited lack of consent or referred to resolutions passed by various cities or localities opposing transportation of nuclear waste. Some comments included statements against the proposed ISP CISF.

Response: In parallel to its environmental review under NEPA, for which this scoping process was conducted, the NRC is conducting a safety review of the license application. The safety and environmental reviews will carefully assess the safety and environmental impacts of the proposed CISF and aspects of the associated transportation of SNF, and will be documented in an EIS and SER. Information from these evaluations will be used by the NRC in the decision whether to grant a license to ISP to construct, operate, and decommission the proposed CISF. While the comments expressing general opposition are useful for the NRC to understand public opinion about the licensing action, the comments provide no new information regarding the scope of the proposed CISF environmental review and will not be addressed further in the EIS.

The NRC is conducting a separate review of the Holtec International license application for a CISF and comments stating opposition to that proposed project are beyond the scope of the ISP EIS. Related comments that contained additional detail about the scope of the review are located in other sections of this report (e.g., Section B.26 on Safety, Section B.25 on Accidents, and Section B.4.2 on *de facto* disposal). Through the Atomic Energy Act, Congress has mandated that the NRC establish regulations to allow the licensing of nuclear facilities, including SNF storage sites. The NRC is following its established regulations in this licensing review and EIS process. Requests to change those regulations are outside the scope of this EIS and should be raised through other mechanisms. See also Section B.2.7 [NEPA Process: Public Participation – Consent Based Siting].

Comments: (1-2-4) (1-13-2) (1-13-11) (1-14-3) (1-15-1) (1-15-11) (1-18-1) (1-18-14) (1-18-15) (1-22-8) (1-23-3) (1-23-6) (1-31-1) (1-36-1) (2-1-1) (2-8-1) (2-8-5) (2-9-5) (2-18-1) (2-18-4) (2-18-8) (2-18-9) (2-20-5) (2-22-1) (2-22-9) (2-24-1) (2-29-4) (2-34-1) (3-2-5) (3-3-7) (3-3-9) (3-12-4) (3-12-6) (3-13-5) (3-20-3) (3-24-4) (4-1-8) (4-4-8) (4-16-1) (4-23-5) (10-1) (11-1) (11-3) (11-5) (12-1) (12-3) (13-1) (14-4) (15-1) (17-3) (18-1) (19-1) (21-1) (22-1) (23-1) (24-1) (25-1) (26-1) (31-1) (33-1) (35-1) (36-1) (37-1) (39-1) (45-1) (46-1) (47-1) (48-1) (49-1) (50-1) (51-1) (52-1) (53-1) (54-1) (57-1) (58-1) (59-1) (59-5) (60-3) (62-1) (63-1) (64-3) (65-4) (66-1) (69-1) (71-1) (71-7) (72-1) (73-1) (75-1) (76-1) (76-6) (78-1) (79-1) (80-1) (81-1) (82-1) (83-1) (84-1) (85-1) (86-1) (87-2) (87-6) (88-4) (88-7) (89-1) (90-1) (91-1) (92-1) (93-1) (95-1) (95-5) (95-7) (96-1) (96-5) (98-10) (99-1) (99-13) (100-5) (101-8) (102-1) (106-1) (107-2) (108-1) (109-1) (109-5) (110-1) (110-4) (111-1) (111-5) (111-7) (112-1) (112-3) (113-1) (114-1) (115-1) (116-1) (117-1) (119-1) (122-1) (123-1) (124-1) (125-1) (126-1) (127-4) (128-1) (130-3) (131-1) (132-1) (133-1) (135-1) (136-1) (137-1) (138-1) (140-13) (141-1) (142-4) (143-6) (144-1) (145-1) (146-1) (146-7) (146-8) (147-1) (147-5) (150-1) (151-2) (152-1) (153-1) (154-1) (155-1) (156-1) (156-2) (158-1) (158-3) (161-1) (164-4) (164-7) (164-19) (166-3) (167-1) (168-1) (168-4) (170-1) (171-12) (175-4) (183-2) (184-2) (193-1) (198-2) (199-1) (200-2) (206-3) (207-1) (214-1) (216-1) (224-1) (225-1) (225-3) (240-1) (245-1) (248-1) (255-1) (261-1) (262-1) (264-1) (264-5) (264-8) (265-1) (268-1) (270-1) (271-1) (277-1) (277-5) (282-1) (283-1) (284-1) (289-1) (296-1) (300-1) (306-1) (309-1) (318-6) (319-1) (320-1) (322-1) (323-1) (324-1) (325-1) (326-1) (327-1) (328-2) (329-2) (330-1) (331-1) (332-1) (333-1) (334-1) (336-1) (337-1) (338-1) (340-1) (341-1) (342-3) (352-2) (370-1) (384-1) (391-1) (394-1) (394-3) (395-1) (395-7) (396-2) (397-1) (398-1) (398-6) (399-1) (399-3) (400-1) (400-6) (402-1) (403-1) (403-3) (404-1) (406-2) (406-5) (407-1) (408-1)

(408-25) (409-1) (410-1) (411-1) (412-1) (413-1) (413-3) (414-1) (415-2) (415-12) (421-1) (421-5) (423-1) (424-1) (426-1) (428-1) (429-1) (430-1) (431-2) (432-1) (433-1) (435-1) (436-1) (436-4) (439-1) (440-1) (441-1) (442-2) (443-3) (444-5) (445-2) (446-1) (448-1) (448-3) (450-1) (451-1) (453-1) (454-1) (457-1) (459-1) (462-1) (463-2) (464-1) (465-1) (466-1) (466-3) (467-2) (467-4) (468-1) (468-7) (469-1) (469-3) (470-7) (470-9) (471-1) (472-1) (473-1) (474-1) (475-1) (477-4) (478-1) (478-5) (479-1) (480-1) (481-1) (482-1) (483-1) (484-1) (485-1) (486-1) (487-1) (488-1) (489-1) (491-1) (491-3) (491-11) (493-1) (494-1) (495-1) (496-1) (497-1) (498-1) (499-1) (500-1) (501-1) (502-12) (502-28) (503-1) (504-1) (506-1) (507-1) (508-1) (509-1) (510-1) (511-1) (513-1) (514-1) (515-1) (516-1) (516-5) (519-1) (519-3) (519-5) (520-1) (520-3) (521-4) (522-1) (522-14) (523-2) (525-8) (526-1) (527-1) (528-1) (530-1) (533-1) (535-1) (536-3) (537-1) (539-1) (539-17) (540-1) (540-16) (541-1) (541-4) (542-11) (543-2) (545-3) (545-17) (545-26) (546-1) (546-7) (547-3) (548-1) (549-1) (550-1) (550-4) (551-3) (553-1) (554-2) (555-1) (556-1) (557-5) (558-1) (559-1) (559-3) (559-21) (562-1) (562-3) (571-1) (571-12) (571-18) (573-3) (575-1) (576-3) (576-16) (578-1) (579-1) (580-1) (581-1) (582-1) (584-2) (585-1) (586-1) (587-1) (588-1) (589-2) (589-9) (590-1) (591-1) (591-3) (592-1) (593-1) (594-1) (595-1) (596-1) (597-1) (598-1) (598-6) (601-1) (602-1) (604-1) (606-2) (609-1) (611-1) (612-1) (613-1) (614-1) (617-1) (620-1) (620-14) (623-1) (626-1) (629-1) (632-1) (633-1) (638-1) (639-1) (640-1) (642-1) (645-9) (646-1) (647-1) (648-1) (649-1) (650-1) (653-1) (656-1) (656-2) (659-1) (660-1) (661-1) (662-1) (669-1) (670-2) (671-1) (675-1) (676-1) (677-1) (678-1) (680-1) (682-1) (688-1) (692-1) (698-3) (701-1) (702-2) (705-1) (705-3) (708-3) (711-2) (712-2) (715-1) (719-1) (720-1) (722-3) (725-1) (734-1) (737-3) (740-4) (742-2) (744-2) (748-2) (759-2) (766-1) (772-1) (777-2) (779-1) (779-2) (780-2) (781-3) (786-2) (788-2) (790-2) (792-2) (795-4) (797-2) (803-1) (805-1) (807-1) (812-3) (815-1) (816-1) (816-6) (819-1) (819-3) (819-26)

B.28.2 General Opposition – Opposition Due to Privatization of SNF Storage or Transportation

Many commenters expressed objections to the privatization of SNF storage and transportation, with some commenters stating this as a basis for objection to the proposed CISF. Some of the comments discussed concerns about the potential for private companies' prioritization of profit margins over safety, which may result in increased risks. Other commenters stated concerns about safe handling of nuclear materials by WCS and other nuclear industry companies. Two commenters also objected to foreign ownership of such a site. Many of the commenters requested that the government maintain authority over SNF storage and disposal.

Response: In accordance with its statutory authority, the NRC issues licenses to private companies who meet NRC's regulatory requirements for civilian use and storage of nuclear materials. The NRC will carefully review the license application and supporting materials to determine whether the proposed project meets all regulatory requirements related to safety, security, and financial assurance, and will disclose the potential environmental impacts of the proposed project in its EIS, which will be published for public comment. Because these comments do not provide information related to the environmental review of the proposed facility, they will not be addressed further in the EIS.

Comments: (3-18-5) (88-5) (93-5) (105-1) (145-5) (163-5) (163-7) (168-2) (203-1) (232-2) (287-1) (290-1) (291-1) (296-2) (298-1) (299-2) (304-1) (313-1) (315-1) (316-1) (316-2) (345-1) (346-1) (349-1) (352-1) (353-1) (354-1) (355-1) (356-1) (359-1) (359-2) (360-1) (363-1) (366-1) (368-1) (369-1) (371-1) (373-1) (376-1) (378-1) (380-1) (381-1) (382-1) (383-1) (385-1) (386-1) (393-1) (456-1) (541-2) (559-11) (563-1) (603-1) (608-1) (616-1) (619-1) (698-1) (718-1) (723-1) (727-1) (729-1) (730-1) (731-1) (733-1) (734-3) (736-1) (737-1) (739-1) (743-1) (744-1) (745-1)

(747-1) (749-1) (751-2) (754-1) (756-1) (757-1) (758-1) (759-1) (765-1) (767-1) (768-1) (781-1) (807-2)

B.29 Comments of General Support

B.29.1 General Support – Support for the Proposed Project

Many commenters expressed support for the proposed CISF project or the ability of ISP and WCS to implement the project. Some of the reasons cited for support include ISP's safety record, the suitability of the site, the extent of site studies, the siting of WIPP or other facilities nearby, or economic development (e.g., gaining jobs). Some commenters also supported the CISF as an interim step toward disposal of SNF in a repository. Several commenters cited community support or local consent for the project. One commenter stated support for both the proposed ISP and Holtec CISFs. In conjunction with these statements of support, a commenter questioned the merit of comments opposing the proposed project.

Response: While these comments are useful for the NRC staff to understand the public perspective on the proposed project, they do not provide any specific information related to the environmental effects of the proposed action and will not be evaluated further in the EIS. As reasons for the statements of support, some of the comments mentioned specific aspects of the ISP proposal that will be evaluated in the EIS. For example, the scope of the EIS with respect to safety is discussed in Section B.26 [Safety] of this report. Chapter 3 of the EIS will describe the site characteristics, which many of the commenters mentioned. With respect to the statement of support for the proposed Holtec project, the NRC is conducting separate evaluations of the two CISF-proposed facilities (Holtec and ISP). The NRC's licensing process is not a competitive process; rather, each proposal will be evaluated based on its own merits and whether the proposed facility meets regulatory requirements. As appropriate, the ISP EIS will discuss potential cumulative impacts associated with the proposed Holtec facility. Regarding criticisms of comments in opposition of the proposed project, see Section B.1 [NEPA Process] of this report.

Comments: (1-5-1) (1-7-1) (1-11-1) (1-17-2) (1-19-1) (1-19-3) (2-13-2) (2-15-2) (2-21-1) (2-23-5) (2-28-4) (3-1-1) (3-6-1) (42-3) (43-1) (74-1) (104-1) (104-3) (427-1) (452-1) (458-1) (490-5) (512-2) (512-4) (560-1) (560-2) (560-3) (560-4) (560-6) (561-1) (607-1)

B.29.2 General Support – Support for WCS/ISP as a Company

Several commenters expressed support for the applicant (ISP) or its partner (WCS). Some of the reasons cited for support include WCS's safety record, business practices, or contributions to the community in which the WCS LLRW facility is located. One of the commenters referred to comparisons between the proposed Holtec CISF and the proposed ISP CISF, stating that the region should be working together on obtaining the licenses.

Response: While these comments are useful for the NRC staff to understand the public perspective on the proposed project and the license applicant, they do not provide any specific information related to the environmental effects of the proposed action and will not be evaluated further in the EIS. The business practices of individual companies are beyond the scope of the EIS. Importantly, with respect to the statements regarding the two proposed CISFs, the NRC is conducting separate evaluations of the proposed facilities (Holtec and ISP). The NRC's licensing process is not a competitive process; rather, each proposal will be evaluated based on its own merits and whether the proposed facility meets regulatory requirements. As appropriate,

the cumulative impacts chapter of the ISP EIS will discuss potential cumulative impacts associated with the proposed Holtec facility.

Comments: (1-21-6) (1-26-2) (1-27-1) (2-3-3) (2-21-2) (2-23-1) (2-25-1) (2-27-1) (34-1) (104-5)

B.30 Comments Determined to be Out of Scope

The comments in this section were determined to be wholly outside of the scope of the EIS because they are about other projects, policies, government agencies, or sites that do not relate to the proposed project. Specific reasons for the out-of-scope determinations are provided in the responses, as appropriate.

B.30.1 Out of Scope – Concerns About Texas Commission on Environmental Quality (TCEQ) Review of WCS LLRW Site

The NRC received several comments stating concerns about TCEQ's review of the WCS license application for a LLRW disposal facility. The comments stated that the site was not properly reviewed, or that objections to the suitability of the site were overruled in the review process.

Response: The NRC has delegated authority through its agreement state program to the State of Texas (through TCEQ), which has licensing authority over the WCS LLRW facility. Although NRC oversees the agreement state programs to ensure that their licensing activities are consistent with NRC requirements, revisiting the TCEQ licensing decision of the WCS facility is beyond the scope of this EIS. However, the NRC will conduct an independent review of the license application for the proposed CISF, which includes characterizing the environment in which the CISF would be built, including geology and water resources (areas of concern raised by the commenters). In addition, because the existing disposal facility would be co-located with the proposed CISF, cumulative impacts related to the presence of the WCS disposal facility will be included in the EIS in Chapter 5 (Cumulative Impacts).

Comments: (545-14) (645-13) (658-1) (740-5) (755-3)

B.30.2 Out of Scope – Conduct Additional Studies

Several commenters requested that the NRC or other agencies conduct additional studies. Suggestions for studies included the nuclear waste management framework (i.e., use of a repository and other storage options), consequences of severe accidents, cask longevity, additional sites, and options for monitoring. Some commenters requested that these studies take place before the NRC makes a decision on the proposed CISF.

Response: The NRC's license application review is a site-specific process based on a well-established regulatory framework that includes a safety and environmental evaluation of the proposed facility. The scope of the EIS focuses on the environmental impacts that could result from the construction, operation, and decommissioning of the proposed CISF. Additional studies beyond the review of the license application are beyond the scope of the EIS.

Comments: (3-10-3) (64-2) (66-5) (75-5) (88-8) (139-5) (139-9) (139-28) (139-30) (211-1) (557-11) (647-3) (654-1) (819-4) (819-9) (819-39)

B.30.3 Out of Scope – Decommissioning Plan

The NRC staff received comments about decommissioning the proposed CISF. One commenter stated that the decommissioning cost estimate in the ER was underestimated because the ER relied on a source that underestimated the costs. Another commenter called the decommissioning cost estimate in the ER unrealistic because the clean-up cost was based on sites with waste recently removed from a reactor rather than wastes transported to and stored at a CISF for some period of time. This commenter also requested clarification and additional information concerning the assumptions for site clean-up.

Response: The NRC regulates the decontamination and decommissioning of materials and fuel cycle facilities, power reactors, research and test reactors, and uranium recovery facilities. An evaluation of the adequacy of the applicant's proposed decommissioning financial assurance will be addressed in the NRC's safety review and is beyond the scope of the EIS. However, the EIS cost-benefit analysis will include a description of the costs and benefits of the proposed CISF. Topics such as constructing, operating, and decommissioning the proposed CISF will be discussed, as appropriate. The license application documents serve as sources for the decommissioning cost estimates considered in the EIS cost-benefit analysis.

Comments: (545-11) (545-13)

B.30.4 Out of Scope – Discontinuation of National Institute of Health (NIH) Study

One commenter objected to the discontinuation of the NIH study on potential health impacts of nuclear reactors.

Response: The scope of the EIS is limited to evaluation of the environmental impacts that could result from the construction, operation, and decommissioning of the proposed CISF. Impacts on human health will be considered as part of the EIS and in the NRC's safety analysis; however, initiation of new studies and continuation of studies being conducted by other agencies are beyond the scope of this review and will not be addressed further in the EIS.

Comments: (3-19-3)

B.30.5 Out of Scope – Financial Assurance

The NRC staff received comments about financial assurance for the proposed CISF. Commenters questioned the ability of ISP to meet NRC's financial assurance requirements. Commenters requested additional information on the process if ISP files for bankruptcy or there is a change in ownership in the future. Several commenters raised the issue of ISP partnering with Orano, a French company. One commenter requested that the EIS consider financial plans and assurance that (i) include the ability to repackage SNF at the CISF and (ii) extend beyond the 40-year license request. One commenter stated that the NRC should consider mitigation in the terms of sufficient financial assurance to protect the environment. Another commenter stated that the financial assurance needed for a CISF goes beyond the current standards. One commenter stated that the EIS should study the funding of SNF storage and recommended changes to how the cost for storing SNF is currently funded. Additional topics raised include accident liability, ownership of the SNF, safety, the need to include the ability to repackage the SNF at the CISF, the timeframe of the EIS analyses, the decommissioning plan, objections to a private company operating a CISF, shifting the responsibility for storing SNF, and *de facto* permanent storage at the CISF.

Response: Financial qualifications and decommissioning financial assurance for the proposed CISF will be addressed in the NRC safety review, which is conducted in parallel with the environmental review. The results of the safety review will be documented in an SER. The safety review includes an evaluation of the applicant's financial qualifications and decommissioning financial assurance and considers whether the applicant has provided reasonable assurance that it is financially qualified to construct and operate the proposed facility and financial assurance for decommissioning the proposed facility in compliance with NRC's financial qualifications and decommissioning financial assurance regulations. Concerns regarding financial liability for accidents are outside the scope of this EIS. Comments related to accident liability and ownership of the SNF are addressed in Section B.6.4 [Assumptions – Legal Framework of the Proposed CISF]. Comments related to Safety are addressed in Section B.26 [Safety]. Comments related to the capability of repackaging the SNF at the CISF as well as the timeframe for the EIS analysis are addressed in Section B.6.3 [Assumptions – Timeframe of the Proposed Action]. Comments related to the decommissioning plan are addressed in Section B.30.3 [Out of Scope – Decommissioning Plan]. Comments related to objections of a private company operating a CISF are addressed in Section B.28.2 [General Opposition – Opposition Due to Privatization of SNF Storage or Transportation]. Comments related to shifting the responsibility for storing SNF are addressed in Section B.21.4 [Cost Considerations – Shifting the Responsibility for Storing SNF]. Comments related to the CISF becoming a *de facto* permanent storage site are addressed in Section B.4.2 [Proposed Action – De Facto Disposal].

Comments: (1-28-7) (2-11-4) (4-9-11) (4-24-6) (88-10) (139-22) (142-10) (163-10) (165-29) (292-1) (302-1) (395-8) (408-14) (415-13) (517-5) (540-13) (542-7) (542-8) (545-8) (545-27) (564-7) (570-18) (576-11) (580-4) (620-10) (645-12) (746-1) (755-5) (763-3) (810-1) (819-11)

B.30.6 Out of Scope – Low-Level Waste Criterion

One commenter stated opposition to relaxing the criterion for the classifications LLRW.

Response: The scope of the EIS focuses on the environmental impacts that could result from the construction, operation, and decommissioning of the proposed CISF, which is proposed to store SNF, a type of HLW, and reactor-related GTCC. Although WCS currently operates LLRW disposal facilities at the site of the proposed CISF, which will be discussed in the cumulative impacts portion of the EIS, revising the definitions of LLRW is beyond the scope of the environmental review and will not be evaluated further in the EIS.

Comments: (172-2)

B.30.7 Out of Scope – Cask and Canister Fabrication Quality

The NRC staff received comments about storage cask and canister fabrication-related quality assurance. Commenters suggested that casks and canisters could be manufactured with defects that would compromise safety functions of the equipment and questioned several aspects of quality assurance and quality control programs, including those during handling, transportation, and acceptance at the proposed CISF. Specific concerns were based on descriptions of historical examples of nonconformance. This included examples involving the adequacy of welds and fabrication of components beyond design specifications.

Response: As part of its safety review, the NRC staff will address whether the proposed design, fabrication, and procurement of structures, equipment, and components to be deployed

at the facility will meet the quality assurance requirements established in 10 CFR Part 72. Therefore, these comments are beyond the scope of the EIS.

Comments: (1-2-3) (1-35-2) (28-16) (819-22)

B.30.8 Out of Scope – Comments Concerning Security and Terrorism

The NRC received several comments expressing concerns about security and the potential for terrorist attacks, sabotage, or theft during SNF transportation or during CISF operations. Commenters expressed general concerns about the likelihood and potential consequences of a terrorist attack on an SNF shipment that results in a release of radioactive material or of the CISF site. Commenters also expressed concerns that the mixture of possible transportation modes and the geographic extent of routes would expose communities nationwide to the risk of a terrorist attack. Specific concerns were expressed about the technology (e.g., military ordnance or drones) available to terrorists that could be used to execute an attack on SNF shipments or at the proposed site. Other concerns were expressed regarding the roles and responsibilities and staffing for ensuring security and possible plans to secure, track, detect threats, and prevent attacks during transport. Other commenters questioned robustness of canisters or casks to withstand attack. Some comments regarding CISF security focused on potential methods of attack (e.g., aircraft, drones, or missiles) and how the facility design either encourages or discourages potential attacks. Some commenters suggested that the proposed facility size increases the risk of aircraft attack. Other commenters suggested that the above-ground design is not safe.

Response: Comments related to security and terrorism are safety issues that are not within the scope of the environmental review.

Comments: (1-13-9) (1-13-10) (1-14-9) (1-18-4) (1-20-7) (1-20-8) (1-23-7) (2-9-6) (2-17-3) (3-16-5) (3-17-2) (3-19-2) (3-20-2) (4-9-10) (4-11-1) (4-12-4) (4-12-7) (4-13-2) (4-13-4) (4-27-1) (6-8) (7-4) (28-6) (30-11) (34-2) (40-6) (66-2) (66-4) (74-2) (98-5) (99-3) (99-8) (100-1) (103-4) (111-4) (139-13) (141-2) (142-6) (152-2) (153-4) (157-1) (171-2) (192-1) (192-2) (193-3) (209-4) (220-13) (223-1) (295-1) (335-3) (335-4) (335-5) (339-10) (394-2) (408-13) (408-30) (410-5) (444-2) (445-4) (460-8) (462-5) (468-5) (476-7) (497-2) (502-23) (511-13) (517-18) (528-9) (542-10) (545-21) (545-22) (548-4) (548-5) (554-9) (559-14) (563-2) (564-4) (580-3) (589-6) (622-1) (645-2) (645-3) (660-3) (669-4) (704-1) (740-1) (748-1) (769-1) (791-1) (796-2)

B.30.9 Out of Scope – Concerns about the WCS Facility or WCS Operations

Several commenters expressed concerns about the WCS disposal facility in Andrews, Texas. Some of the commenters raised questions regarding WCS as a company, its operating practices, its credibility, and its compliance with regulatory or safety policies. Some of the comments raised objections to the siting of the WCS LLRW disposal site.

Response: The LLRW facility at WCS is regulated by the TCEQ through its agreement state authority. The proposed CISF and existing LLRW facility would be co-located; however, the NRC staff will independently evaluate the safety and environmental impacts of the proposed CISF during the licensing process, but will not reevaluate the WCS LLRW facility. The safety and environmental reviews will determine whether the proposed CISF would be in compliance with the NRC's regulatory standards for protection of public health and safety. Information in the applicant's documents, including their safety report, environmental report, responses to RAIs, and other supporting documentation will be carefully reviewed and verified by the NRC

staff. Licensing decisions and operations of the WCS LLRW facility will not be addressed in the EIS, except in the cumulative impacts analysis, where the presence of and impacts from the LLRW facility will be considered. Therefore, comments related to the licensing of the LLRW facility are considered beyond the scope of the NRC's environmental review, and will not be evaluated further in the EIS. Related comments regarding licensing of WCS by TCEQ are addressed in Section B.30.1 [Out of Scope – Concerns About TCEQ Review of WCS LLRW Site].

Regarding the credibility of the applicant, the NRC will carefully review the license application and supporting materials to determine whether the proposed project meets all regulatory requirements related to safety, security, and financial assurance, and will disclose the potential environmental impacts of the proposed project in its draft EIS, which will be published for public comment.

Comments: (3-5-1) (4-28-3) (108-2) (161-10) (566-4) (566-18) (566-19) (571-6) (819-29)

B.30.10 Out of Scope – Opposition to Nuclear Power, Weapons, and Industry and Calls for Renewable Energy Sources

Several commenters expressed opposition to nuclear power, nuclear weapons, and the nuclear power industry (including uranium mining) or expressed support for use of renewable energy sources instead of nuclear energy. Comments included calls to stop generating additional spent fuel, to stop licensing and relicensing nuclear facilities, to close and decommission all nuclear facilities, and to replace nuclear power with renewable energy. In expressing their opposition to nuclear power, commenters cited safety, environmental, and cost concerns regarding the operation of nuclear plants and the storage and disposal of SNF. Some commenters stated concern that licensing this facility may encourage new or continued use of nuclear power.

Response: Comments opposing nuclear power and the associated generation of SNF are beyond the scope of the EIS. This environmental review addresses the potential environmental impacts that could result from the construction, operation, and decommissioning of the proposed CISF. Further, the NRC is an independent regulatory agency that does not promote nuclear or other types of energy. The NRC does not have licensing authority over uranium mining. Additionally, the NRC does not participate in business decisions of individual companies regarding whether to pursue new uranium mining projects. Regarding the comment requesting that the NRC require States with nuclear reactors to transition to renewable energy sources, the NRC does not have regulatory authority over States regarding decisions on energy use. The NRC has regulatory authority over civilian uses of nuclear materials and does not license or regulate alternative sources of energy, nor can it require States to employ any energy source. In addition, the U.S. nuclear weapons programs fall under the jurisdiction of the DOE. The NRC has regulatory authority only over civilian uses of nuclear materials and has a rigorous regulatory framework in place to safeguard these materials. The NRC does not promote, regulate, maintain, or develop nuclear weapons. Thus, these comments will not be addressed further in the EIS.

Comments: (1-22-2) (2-2-2) (3-11-2) (3-11-3) (3-19-9) (32-5) (58-7) (59-3) (61-4) (61-8) (71-5) (93-4) (115-3) (115-4) (118-4) (118-20) (130-2) (135-4) (144-3) (162-1) (177-3) (179-1) (181-1) (182-1) (183-1) (184-3) (185-3) (186-2) (189-1) (194-1) (195-2) (197-2) (198-3) (202-2) (203-4) (205-1) (210-1) (210-2) (214-2) (215-2) (217-4) (219-1) (223-2) (227-1) (228-1) (231-1) (233-1) (244-1) (245-2) (254-1) (256-1) (257-1) (259-1) (266-2) (269-1) (276-2) (321-4) (335-8) (335-9) (361-1) (374-1) (420-1) (450-2) (456-2) (459-3) (460-2) (468-3) (468-6) (470-2) (470-10) (479-2)

(523-1) (528-13) (535-2) (535-4) (543-1) (543-3) (555-4) (565-1) (568-3) (569-1) (569-4) (585-2) (613-2) (615-1) (621-1) (626-3) (627-1) (630-1) (661-2) (661-3) (662-3) (667-1) (674-1) (684-1) (693-1) (696-1) (698-2) (699-1) (712-1) (714-1) (724-2) (725-2) (750-1) (760-1) (764-1) (780-1) (780-4) (783-1) (783-2) (785-1) (787-1) (789-1) (793-3) (795-1) (795-3) (797-1) (798-1) (799-1) (802-1) (805-4) (806-1) (808-1) (808-2) (809-2) (811-1) (812-2)

B.30.11 Out of Scope – Political Decisions

Several comments were submitted that discussed national and local politics. A few comments stated concerns about political decisions and political processes for decision-making at national, State, and local levels. Some comments made statements against politicians who had supported the WCS LLRW facility or made statements directed at local and State politicians.

Response: The NRC operates on a well-established Federal regulatory framework through which licensing decisions for nuclear facilities are made. This environmental review focuses on the potential impacts that could result from the proposed CISF. Political processes, elections and candidates, past political decisions, and future political decisions are not within the scope of the environmental review and will not be addressed further in the EIS.

Comments: (2-34-3) (3-20-1) (3-29-5) (4-14-7) (23-4) (73-3) (76-2) (76-4) (95-6) (97-1) (101-1) (148-1) (163-6) (237-1) (243-1) (251-1) (252-1) (263-2) (264-2) (277-3) (296-4) (303-1) (305-1) (307-1) (357-1) (358-1) (362-1) (367-1) (379-1) (387-1) (389-1) (390-1) (542-9) (556-4) (643-2) (690-1) (726-1) (728-1)

B.30.12 Out of Scope – Reprocessing or Other Uses of SNF

Several commenters provided comments about reprocessing of SNF. Some comments discussed the possibility that the proposed CISF could be related to plans for future reprocessing of SNF. Some of the comments noted environmental concerns about reprocessing. Some stated support for reprocessing, while others stated opposition. One commenter noted that reprocessing-related technologies may become available in the future.

Response: The comments discussing or expressing opinions about reprocessing or other uses of SNF are beyond the scope of the EIS. The scope of the EIS considers only the potential environmental impacts of the proposed CISF and associated infrastructure, and does not consider impacts from any fuel cycle facilities, including reprocessing, or other uses of the SNF. There are no current expressions of interest or license applications for a reprocessing facility before the Commission; therefore, reprocessing is not considered a reasonably foreseeable future action. Reprocessing will not be addressed further in the EIS.

Comments: (1-16-7) (202-1) (511-15) (517-17) (539-12) (554-10) (653-3) (763-2) (819-18)

B.30.13 Out of Scope – Role of Department of Energy

The NRC received a comment about the DOE, their relationship with WCS, and their role in promoting nuclear energy.

Response: The NRC, not DOE, has regulatory authority for licensing the proposed CISF. The NRC does not promote nuclear power and does not fund the applicants' activities. The DOE has a mission that includes promoting the development of energy sources to meet the country's

needs. However, the role of DOE in promoting nuclear power and its relationship with WCS are not within the scope of this environmental review and will not be addressed further in the EIS.

Comments: (3-29-3)

B.30.14 Out of Scope – Storage and Transportation of High-Burnup SNF

The NRC received comments about the safety of the storage and transportation of high-burnup SNF. Commenters expressed concerns regarding the knowledge base about storage and transportation of high-burnup SNF, the cask and canister certification process for high-burnup SNF, the higher radioactivity and heat and potential degradation of SNF, and associated aging management concerns. Some commenters were concerned about the safety of transportation after storage and they expressed a lack of confidence in NRC cask evaluation and testing. Other commenters expressed concerns about SNF reactivity with air, long-term storage impacts, monitoring sealed canisters, and mixing high- and low-burnup SNF in storage canisters. One commenter was concerned about release of radioactive gas from storage in the proposed storage system.

Response: Concerns about the NRC's safety programs, including the safety evaluations in licensing and the certification of casks systems for storage and transportation of high-burnup SNF, are outside the scope of the EIS.

Comments: (2-33-1) (3-7-3) (4-29-2) (139-29) (339-2) (505-1) (505-7) (505-8) (523-8) (539-9)

B.30.15 Out of Scope – Storage of Foreign Spent Fuel at the Proposed CISF and Foreign Ownership

The NRC staff received comments objecting to foreign ownership of the proposed CISF, or opposing storage and disposal of nuclear waste or SNF from foreign countries at the proposed CISF.

Response: The proposed NRC Federal action would be to authorize the construction and operation of the proposed ISP CISF to store 500 canisters of SNF for the initial phase (Phase 1) of the proposed project for a license term of 40 years. Within the license application, the applicant did not propose to store SNF from foreign countries; therefore, the shipment and consolidated interim storage of SNF originating from foreign countries is outside the scope of the environmental review and will not be considered further in the EIS. Issues related to foreign ownership are outside the scope of the EIS; however, there is no blanket prohibition on foreign ownership for a CISF, as there is for a power reactor.

Comments: (4-13-1) (159-2) (405-1) (517-12)

B.30.16 Out of Scope – Support for Nuclear Power and the Nuclear Industry

One commenter expressed support for nuclear power and the nuclear power industry.

Response: Comments in support of nuclear power and nuclear applications are beyond the scope of the EIS. This environmental review addresses the potential impacts that could result from the proposed CISF. Further, the NRC is an independent regulatory agency that does not promote nuclear or other types of energy. This comment will not be addressed further in the EIS.

Comments: (2-16-1)

B.30.17 Out of Scope – Support for Other Sites

The NRC staff received a comment expressing support for the nuclear industry in New Mexico, including the URENCO facility.

Response: The scope of the EIS will be limited to an analysis of the environmental impacts from the proposed CISF. The EIS will also include a cumulative impacts analysis that considers past, present, and reasonably foreseeable future actions (including existing facilities) in the vicinity of the proposed site that may affect the same resources as the proposed CISF. Comments that provide support for other facilities are outside the scope of the EIS. Because this comment is beyond the scope of the environmental review, it will not be addressed further in the EIS.

Comments: (1-6-4)

B.30.18 Out of Scope – Criticisms Regarding NRC Credibility

The NRC received comments about its credibility as a regulator. Some comments expressed concern over the integrity, transparency, or credibility of the NRC as a regulator of the nuclear industry. Some of the comments called on NRC to regulate responsibly or criticized the agency for its licensing decisions. Other comments raised questions about NRC's motivations, relationship with the license applicant (or nuclear industry) and concern for safety and the environment. Some comments stated concerns about quality assurance oversight by NRC with respect to storage casks.

Response: The NRC is an independent agency established in 1974 to ensure the safe use of radioactive materials for beneficial civilian purposes while protecting people and the environment. The NRC takes its regulatory responsibilities seriously, and strives to conduct its activities in an open and transparent manner, consistent with the NRC Approach to Open Government (<https://www.nrc.gov/public-involve/open.html>). Because these comments do not provide information related to the environmental review of the proposed CISF, they will not be evaluated further in the EIS. Additional comments regarding the Yucca Mountain repository are located in Section B.30.22 [Out of Scope – Yucca Mountain].

Comments: (1-14-2) (1-14-8) (3-19-10) (3-29-1) (3-29-2) (4-13-6) (28-15) (28-17) (88-9) (158-2) (158-4) (166-1) (306-2) (308-1) (419-2) (432-2) (434-2) (460-17) (462-3) (568-4) (622-2) (705-2) (716-1) (742-1) (751-1)

B.30.19 Out of Scope – Concerns Regarding Legacy Issues at Nuclear Sites

The NRC received comments expressing concerns about past nuclear-related projects and the lack of cleanup for those projects. In addition to the health concerns, the commenters attribute to those projects, the comments raised issues with responsibility and compensation for past projects and the lack of trust in industry and regulators that resulted from legacy projects. Many of the comments stated these concerns as a reason for opposition to the proposed CISF project.

Response: Comments regarding other facilities, legacy sites, concerns about uranium mining, and compensation or cleanup for past projects are not within the scope of the EIS. Some of the

projects listed by commenters are sites used for legacy DOD activities, which are not within the statutory purview of the NRC. The scope of the EIS focuses on the environmental impacts that could result from the construction, operation, and decommissioning of the proposed CISF. However, as part of the analysis of the proposed action, which is a site-specific CISF, the NRC will consider and evaluate human health impacts related to the proposed facility, as well as the cumulative impacts that could occur from the incremental impact of the proposed CISF when added to past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal), person, or entity undertakes these actions.

The NRC takes seriously any information about potential safety issues. Any information regarding the proposed CISF will be considered by the NRC as part of the license application review process. Concerns about any other NRC-licensed activities will be handled through the NRC's allegation process. For more information on the allegations process and how to report a safety concern, please visit <https://www.nrc.gov/about-nrc/regulatory/allegations-resp.html>. Because these comments are beyond the scope of the environmental review, they will not be addressed further in the EIS.

Comments: (1-36-2) (2-11-1) (2-14-1) (3-3-1) (59-2) (314-1) (448-2) (569-3) (571-10) (624-1) (631-1) (685-1) (713-1) (720-2) (738-1) (741-1) (752-1) (782-1) (792-1) (794-1) (812-1)

B.30.20 Out of Scope – Site Specific Issues at Other Facilities

The NRC received several comments about site-specific issues at the licensed (but not constructed) Private Fuel Storage site; individual nuclear power plants; WIPP; National Laboratories; the Fukushima Dai-ichi nuclear power plant; and other nuclear-related facilities, including spent fuel storage pools at nuclear reactors. These comments refer to site-specific licensing issues or onsite spent fuel storage concerns, as well as a range of safety and environmental concerns, including transportation or cleanup costs, at individual sites. Some comments referred to concerns about safety at the WIPP facility. Some commenters referred to SNF being stored at WIPP. Some commenters expressed concerns about problems with casks at the San Onofre Nuclear Generating Station in California. One commenter stated concerns based on issues with a landfill near their city.

Response: The scope of the EIS is limited to an analysis of the environmental impacts from the proposed CISF. The EIS will include a cumulative impacts analysis that considers past, present, and reasonably foreseeable future actions (including existing facilities) in the vicinity of the proposed site that could affect the same resources as those affected by the proposed CISF. Comments about site-specific concerns at other locations are outside the scope of the EIS, and previously certified casks and storage systems will not be re-addressed in the EIS. The NRC's safety review will carefully analyze the safety and security of this proposed CISF, including potential risks of credible accidents specific to the proposed CISF. A discussion of the scope of the EIS with respect to safety and accidents can be found in Sections B.26 and B.25, respectively, of this report. The NRC notes that WIPP is a DOE facility over which NRC does not have regulatory authority. There is no HLW stored at WIPP, nor is such storage proposed as part of this licensing action.

Comments: (1-12-5) (1-13-6) (1-16-4) (1-16-9) (1-22-3) (1-25-1) (1-28-3) (1-35-1) (1-35-3) (3-2-2) (3-13-1) (3-18-3) (3-19-6) (3-22-3) (4-3-5) (4-4-5) (4-12-6) (4-13-3) (32-4) (77-1) (93-3) (98-4) (134-4) (134-10) (134-14) (139-31) (159-1) (190-1) (204-1) (220-1) (229-1) (294-1) (329-1) (460-16) (468-4) (505-11) (519-10) (530-2) (545-12) (555-2) (557-12) (568-5) (569-2) (652-1) (683-3) (762-2) (819-27)

B.30.21 Out of Scope – Comments Regarding Use of Yucca Mountain as a Repository or the Lack of Available Repository

Several comments included statements about the need for a repository or permanent solution (e.g., instead of interim storage), with some comments questioning whether licensing a CISF would distract from plans to develop a repository, expressing skepticism that a permanent repository is feasible, or recommending that review of the proposed Yucca Mountain repository in Nevada be reinstated. Some comments included statements about what would be needed for a permanent repository. Some comments included indications of opposition to the proposed project.

Response: The NRC is reviewing a license application by ISP under 10 CFR Part 72 to operate an interim storage facility for SNF for up to 40 years. Ultimately, the SNF at the proposed CISF would be relocated to a permanent geologic repository, and the existence of the proposed CISF would not lessen the need for a permanent repository. The applicant did not design or propose the CISF to become a permanent repository and, should the NRC grant the license, it would not be approving the permanent storage of SNF at the proposed facility. Before the expiration of an initial license for an interim storage facility, the applicant may submit an application to the Commission to renew the license. This renewal process would include a separate safety and environmental review. The national policy for disposition of SNF remains disposal in a permanent geologic repository. This concept, and NRC's determinations regarding feasibility of a geologic repository, are discussed in NUREG–2153, Appendix B (NRC, 2013). The NRC has recognized and acknowledges the political uncertainty and difficulties in siting and licensing a geologic repository and has also addressed this in Appendix B of the GEIS. Furthermore, the purpose and need for the proposed action is to provide a temporary storage solution before a repository becomes available. Therefore, comments regarding use of Yucca Mountain or a repository instead of a CISF are outside the scope of the EIS and will not be addressed further in the EIS.

Comments: (3-5-9) (3-31-6) (32-2) (96-3) (98-7) (152-3) (335-7) (337-2) (384-2) (408-12) (408-29) (421-2) (445-1) (478-4) (531-2) (533-2) (571-19) (576-12) (596-4) (622-3) (635-1) (650-3) (663-2) (674-2) (732-1) (817-2)

B.30.22 Out of Scope – Comments Regarding Yucca Mountain

The NRC received several comments about the proposed Yucca Mountain repository that expressed criticism of the project or questioned the adequacy of that site. Some of these comments discussed the evaluations for Yucca Mountain or community dissent with respect to Yucca Mountain.

Response: In this environmental review, the NRC staff will evaluate the potential impacts of the proposed CISF and reasonable alternatives on the environment; therefore, comments concerning the licensing of the Yucca Mountain repository are beyond the scope of the EIS. The purpose and need for the proposed action is to provide a temporary storage solution before a repository becomes available. However, disposal of SNF and HLW remains the national policy in the Nuclear Waste Policy Act, as amended. The NRC conducted a thorough safety evaluation of the DOE's license application for Yucca Mountain and published its findings in January 2015, in a five-volume SER (NUREG–1949). In May 2016, the NRC also published the "Supplement to the Department of Energy's Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada," (NRC, 2016), which evaluated the potential environmental

impacts on groundwater and impacts associated with the discharge of any contaminated groundwater to the ground surface due to potential releases from a geologic repository for SNF and high-level radioactive waste at Yucca Mountain, Nye County, Nevada. These documents contain the NRC's most recent technical evaluations of the suitability of that site. The completion of Yucca Mountain licensing activities is subject to Congressional appropriations and other actions external to the NRC. Because these comments are beyond the scope of the environmental review, they will not be addressed further in the EIS.

Comments: (1-9-4) (17-1) (176-1) (524-1) (530-4) (545-1)

B.30.23 Out of Scope – Miscellaneous

The NRC staff received several comments on a variety of topics that are not related to the scope of the EIS. The comments included statements about the definition of HLW and the suspension of WCS's previous application. Another commenter was concerned with what they considered to be the spread of falsehoods and exaggerations about the proposed CISF with the intent "to scare the community and the surrounding areas".

Response: The issues raised in these comments are outside the scope of the environmental review process and will not be addressed in the EIS.

Comments: (1-25-3) (1-33-1) (1-34-1) (2-3-4) (2-4-1) (2-9-2) (412-4) (412-11) (427-2) (463-3) (572-1) (645-14)

C Table of Commenter Names and Affiliations

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Acosta, Humberto		Meeting Transcript (ML17062A614)	2-2
Acosta, Richard		Email (ML18354A024)	663
ACTAs, Anonymous		Email (ML18282A280)	432
Adelson, Julie		Email (ML17113A056)	688
Agata, J		Email (ML17063A309)	367
Agius, Ruth		Email (ML18351A434)	808
Ahlander, Annette		Email (ML19004A087)	684
Akin, Andrew		Email (ML17082A571)	560
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Anonymous, Anonymous		reg.gov (ML17060A241)	86
Anonymous, Anonymous		reg.gov (ML17061A194)	91
Anonymous, Anonymous		reg.gov (ML17061A197)	94
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Anonymous, Anonymous		reg.gov (ML17081A102)	141
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Anonymous, Anonymous		reg.gov (ML17122A228)	163
Anonymous, Anonymous		reg.gov (ML18295A006)	404
Anonymous, Anonymous		reg.gov (ML18295A008)	405
Anonymous, Anonymous		reg.gov (ML18305A244)	600

Commenter	Affiliation (if stated)	Comment Source and Document ID	Correspondence ID
Anonymous, Anonymous		reg.gov (ML18310A190)	588
Anonymous, Anonymous		reg.gov (ML18324A763)	597
Anonymous, Anonymous		reg.gov (ML18324A764)	598
Anonymous, Charlotte		reg.gov (ML17059D110)	80
Anonymous, Emma		reg.gov (ML17048A174)	48
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Avila, Roman		Email (ML17101A248)	741
Baggs, Bo		Email (ML18295A639)	581
Bagley, L		Email (ML17055C565)	294
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Bender, Kae		Email (ML18290B150)	613
Berkowitz, Henry		Email (ML18324A361)	630

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Berkowitz, Henry		Email (ML18338A705)	633
Berman, Lila		Email (ML17113A867)	709
Best, A		reg.gov (ML17103A142)	156
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Bezansib, David		Email (ML18352A060)	809
Bichl, Fred		Email (ML18289B286)	607
Biddle, Lynn		Email (ML17082A559)	556
Bilenko, Stephanie		Email (ML18347B396)	503
Bilenko, Stephanie		Meeting Transcript (ML17067A323)	3-28
Bill, Eileen		Email (ML17122A227)	162
Birks, Beverly		Email (ML18323A768)	796
Birnbaum, Beth		Email (ML17101A925)	742
Bisker, Edward		Email (ML17055B156)	292
Black, Ron	Lea County Commission	Meeting Transcript (ML17061A744)	1-2
Blackburn, Tom		Email (ML19003A635)	681
Blaedel, Robert		Email (ML17111A509)	251
Blaedel, Robert		Email (ML17111A545)	252
Blake, Pam		Email (ML17111A272)	242
Blake, Pam		Email (ML17113A644)	704
Bloom, Naomi		Email (ML17121A489)	569
Bluestein, Bonnie		Email (ML17121A483)	721
Blustein, Bonnie		Email (ML18354B385)	668
Blustein, Bonnie		Meeting Transcript (ML17067A323)	3-24
Bogen, Doug		Email (ML18355A195)	818
Bonime, Karen		Email (ML17121A527)	573
Bonniwell, Colleen		Email (ML18323A737)	794
Bonniwell, Colleen		Email (ML18324A277)	801

Commenter	Affiliation (if stated)	Comment Source and Document ID	Correspondence ID
Booz, Martha		Email (ML17113A823)	706
Borello, Chris		Email (ML18289A124)	784
Borgen, Debra		Meeting Transcript (ML17062A614)	2-20
Boshoven, Jack		Meeting Transcript (ML17062A614)	2-15
Boudart, Jan		reg.gov (ML17053C109)	148
Bowen, Dane		Email (ML17055A003)	287
Bowin, Mira		reg.gov (ML17059D371)	64
Boyle, Donna		Email (ML17113A841)	177
Boynton, Elizabeth		Email (ML17061A358)	347
Braden, Al		Email (ML18324A265)	650
Bramblett, Sharon		reg.gov (ML18274A207)	327
Brand, Jackson		Email (ML17054D160)	205
Brand, Jackson		Email (ML17113A376)	696
Brandariz, Anita		Email (ML17111A297)	243
Braswell, Ann		Email (ML19002A346)	678
Bratcher, Suzanne		Email (ML17088A022)	376
Breda, Bo		Email (ML17111A445)	248
Brenner-Ward, Isis		Email (ML17048A368)	21
Brexel, Sr., Charles		Email (ML18355A056)	672
Bright, Larry		Email (ML17058A320)	299
Brister, Bob		Email (ML18351A473)	506
Britten, Jay	Waste Control Specialists	Meeting Transcript (ML17061A744)	1-24
Britten, Jay	Waste Control Specialists	Meeting Transcript (ML17062A614)	2-27
Brockton, Dallas		Email (ML17113A108)	689
Brown, Fred		reg.gov (ML17081A087)	132
Brown, Tim		Email (ML18338A590)	478
Brownrigg, Sarah		Email (ML17054D741)	217
Bruce, Felicia		Email (ML17113A862)	707
Brunson, Andrew		Email (ML18338A613)	487

Commenter	Affiliation (if stated)	Comment Source and Document ID	Correspondence ID
Brunson, Andrew		reg.gov (ML18305A249)	587
Bunting, Doralea		Email (ML17082A522)	550
Bunting, Meredith		Email (ML17082A522)	550
Burch, Bev		Email (ML17091A263)	384
Burnam, Lon		Meeting Transcript (ML17061A744)	1-14
Burnam, Lon		Meeting Transcript (ML17061A744)	1-31
Burnam, Lon		Meeting Transcript (ML17062A614)	2-9
Burnham, Cynthia		Email (ML17060A022)	304
Burns, Terry	Sierra Club, Alamo Group of Lone Star Chapter	Email (ML17082A569)	559
Burns, Terry	Sierra Club, Alamo Group of Lone Star Chapter	Email (ML18289A541)	576
C, Rachel		reg.gov (ML17086A109)	150
Caddell, Sherri Hudgens		Email (ML17033B528)	9
Callahan, Amalie		Email (ML17111A209)	238
Camara, Terri		reg.gov (ML17081A027)	111
Campbell-Barton, Kathy		Email (ML17113A462)	701
Canestaro-Garcia, Alice		Email (ML18324A279)	469
Cardona, Patricia		Email (ML18354B443)	669
Carney, Heather		Email (ML17053D025)	183
Carpenter, L		Email (ML17113A330)	693
Carroll, Glenn		Email (ML18354B196)	666
Carson, Christopher		Email (ML18338A630)	490
Cartwright, Jay		Email (ML18282A272)	427
Casper, Chris		Email (ML18288A446)	777
Castilleja, Rebecca		Email (ML17124A564)	768
Chabra, Steven		Email (ML17082A498)	532
Chandler, David		Email (ML17054D637)	210
Chang, Debra		Email (ML17087A370)	372

Commenter	Affiliation (if stated)	Comment Source and Document ID	Correspondence ID
Chauvin, Marg		Email (ML18354B363)	640
Childers, Clark		reg.gov (ML17054C355)	51
Christiansen, Joan		Email (ML18355A248)	528
Cicchi, Carla		Email (ML17095B072)	724
Clark, Terrence	Physicians for Social Responsibility	Email (ML18347B213)	502
Cleaver, Harry		Email (ML17054C295)	197
Clemons, Catherine		Email (ML18323A382)	602
Clifford, Kay		Email (ML17059D312)	301
Cobb, Sam	City of Hobbs	Meeting Transcript (ML17061A744)	1-1
Cockrell, Ann		Email (ML17054A586)	193
Coghlan, Jay	Nuclear Watch New Mexico	Email (ML18354A222)	819
Cohen, Allen		Email (ML17110B065)	228
Cohen, Karen		Email (ML18295A743)	585
Cole, Crystal		Email (ML18338A608)	484
Collier, Ken		Email (ML18288A302)	776
Collins, Sherron		Email (ML17097A132)	726
Comella, John		Email (ML17112A488)	276
Commenters, Multiple		Email (ML18282A286)	6
Concerned, Catherine		reg.gov (ML18324A499)	595
Conn, Patrick		Email (ML17059D764)	306
Cook, Gary		Email (ML17102B477)	750
Cook, Gary		Email (ML17112A436)	274
Cook, Gary		Email (ML18285A538)	771
Cook, Gary		Email (ML18290B123)	611
Cooke, Linda		Email (ML18353A163)	815
Copelin, Laura		reg.gov (ML17054C356)	52
Cordero, Isabella		Email (ML18355A115)	817
Cordoba, Augustino		Meeting Transcript (ML17062A614)	2-12
Corry, Ronit		Email (ML17053A058)	24
Cosentino, Henrietta		Email (ML17121A488)	568

Commenter	Affiliation (if stated)	Comment Source and Document ID	Correspondence ID
Crane, Stuart		reg.gov (ML18274A208)	328
Crawford, Judy		reg.gov (ML17081A024)	108
Creech, Wendell		reg.gov (ML18324A495)	592
Croom, Carolyn		Email (ML18324A052)	648
Cully, Paul		Email (ML17100B228)	736
Cumming, Diana		Email (ML18352B267)	814
Cunningham, James		reg.gov (ML18302A213)	420
Curry, Karen		Email (ML18354A704)	638
D'Arrigo, Diane	Nuclear Information & Resource Service	Email (ML17121A526)	572
D'Arrigo, Diane	Nuclear Information & Resource Service	Email (ML18355A311)	539
D'Arrigo, Diane	Nuclear Information & Resource Service	Meeting Transcript (ML17061A744)	1-16
D'Arrigo, Diane	Nuclear Information & Resource Service	Meeting Transcript (ML17061A744)	1-33
D'Arrigo, Diane	Nuclear Information & Resource Service	Meeting Transcript (ML17062A614)	2-11
D'Arrigo, Diane	Nuclear Information & Resource Service	Meeting Transcript (ML17102B446)	4-21
D'Arrigo, Diane	Nuclear Information Resource Service	Email (ML17082A553)	554
D'Arrigo, Diane	Nuclear Information Resource Service	reg.gov (ML18277A229)	339
Daboul, Jane		reg.gov (ML17100A306)	151
Dalbey, Tim		reg.gov (ML17081A036)	120
Dale, Felecia		Email (ML17113A902)	710
Dalton, David		Email (ML17100B361)	738
Dalton, David		Email (ML18291B256)	624
Daniel, Theresa	Dallas County, Texas	reg.gov (ML18291A669)	398
Darden, Elizabeth		Email (ML17102B878)	227
Daubert, Karen		Email (ML17112A685)	280

Commenter	Affiliation (if stated)	Comment Source and Document ID	Correspondence ID
Daidsen, Judith		Email (ML17054D126)	30
Davies, Buzz		Email (ML17113B075)	716
Davis, Alex		Email (ML17055C568)	295
Davis, Betty		reg.gov (ML18299A217)	415
Davis, Chandler		Email (ML18284A220)	770
Dean, Nancy		Email (ML17102A333)	745
Dicken, Don		Email (ML17053D921)	189
Dickerson, Jaime		reg.gov (ML17048A169)	45
Dinh, Julie		Email (ML18324A398)	475
Dolgener, Richard		Meeting Transcript (ML17062A614)	2-26
Dolgener, Richard		Meeting Transcript (ML17067A323)	3-1
Dominguez, Alfredo		Meeting Transcript (ML17061A744)	1-20
Dominguez, Alfredo		Meeting Transcript (ML17061A744)	1-30
Dominquez, Timothy		Meeting Transcript (ML17061A744)	1-28
Dozier, Annette		Email (ML18338A715)	499
Dragisic, Jeanette		Email (ML18282A273)	428
Dragisic, Jeanette		Email (ML18338A607)	483
Drey, Kay		reg.gov (ML18295A011)	407
Dubois, Gwen L	Chesapeake Physicians for Social Responsibility; Crabshell Alliance	reg.gov (ML17081A034)	118
Dufford, Beth		Email (ML18338A716)	500
Dumas, Lloyd		Email (ML17053C580)	180
E., C.		reg.gov (ML18274A209)	329
Eagle, Maj-Britt		Email (ML18324A339)	472
Earles, Jim		Email (ML18324A183)	467
Edwards, Diana		Email (ML19004A057)	682
Ehl, Mark		reg.gov (ML18324A498)	594

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Eisenrich, Lloyd		Meeting Transcript (ML17062A614)	2-19
Elliot, William		Email (ML17111B082)	256
Ellis, Barbara		Email (ML18289A522)	448
Ellis, Gail		Meeting Transcript (ML17062A614)	2-33
Erdlac, Richard		Email (ML18289A425)	445
Erickson, Steve		Email (ML18355A258)	530
Evans, Jeanne		Email (ML18338A489)	477
Fairfield, Richard		Email (ML18324A187)	629
Fairfield, Richard		Email (ML18338A643)	802
Falcon, Charlie		Email (ML17054D850)	34
Falcon, Charlie		Meeting Transcript (ML17062A614)	2-21
Fassler, Charlotte		reg.gov (ML17048A171)	46
Fawcett, Linda		reg.gov (ML17081A029)	113
Feil, Kim		reg.gov (ML18275A028)	336
Fielden, Jessica		Email (ML17054D828)	221
Fields, Sarah		Meeting Transcript (ML17067A323)	3-14
Fields, Sarah		Meeting Transcript (ML17067A323)	3-26
Fields, Sarah	Uranium Watch	reg.gov (ML17128A397)	165
Fieri, D		Email (ML17097A619)	729
Fierro, Jeanette		reg.gov (ML18277A230)	340
Filanda, Roberta		Email (ML18355A396)	541
Flores, Yaneth		reg.gov (ML18270A032)	322
Fobes, Richard		Email (ML17059E134)	37
Ford, Michael	Waste Control Specialists	Meeting Transcript (ML17061A744)	1-25
Ford, Michael	Waste Control Specialists	Meeting Transcript (ML17061A744)	1-34

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Ford, Michael	Waste Control Specialists	Meeting Transcript (ML17067A323)	3-6
Ford, Michael	Waste Control Specialists	Meeting Transcript (ML17102B446)	4-18
Ford, Michael	Waste Control Specialists	Meeting Transcript (ML17102B446)	4-25
Foreman, Judia		reg.gov (ML18325A016)	604
Forsberg, Jean		Email (ML17059D967)	314
Foster, Beverly		Email (ML17111B080)	255
Frackiewicz, Barbara		reg.gov (ML17081A021)	105
Franks, Don		Email (ML17059D827)	224
Franzmann, Paul		Email (ML17124A267)	767
Freeman, Beth Jane		Email (ML18296A316)	789
Freeman, Claudia		Email (ML17111A191)	235
Fudzie, Elmer		Email (ML18289A552)	449
Fullmer, Jack		Email (ML17054D617)	31
Fusinato, Robert		Email (ML18338A400)	653
Futrell, Sherrill		Email (ML17112A323)	268
G, C		Email (ML17110A810)	757
Gaab, Donna		Email (ML17054D670)	214
Galbraith, Judy		Email (ML18353A090)	510
Galindo, Mathew		reg.gov (ML18270A028)	320
Garboushian, Ralph	CapitalEdge	reg.gov (ML18291B030)	400
Garbulinski, Greg		Email (ML18354A191)	637
Gardner, Rose		Email (ML17121A504)	571
Gardner, Rose		Email (ML18354B379)	816
Gardner, Rose		Email (ML18354B436)	520
Gardner, Rose	Alliance for Environmental Strategies	Meeting Transcript (ML17061A744)	1-18
Gardner, Rose	Alliance for Environmental Strategies	Meeting Transcript (ML17061A744)	1-29
Gardner, Rose	Alliance for Environmental Strategies	Meeting Transcript (ML17062A614)	2-22

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Gardner, Rose	Alliance for Environmental Strategies	Meeting Transcript (ML17102B446)	4-1
Gardner, Rose	Alliance for Environmental Strategies	Meeting Transcript (ML17102B446)	4-16
Geltman, Richard		Email (ML17059D330)	302
Gerety, Meghan		reg.gov (ML17061A195)	92
Gerfers, C Arthur		reg.gov (ML17081A045)	127
Gianantoni, Maryann		Email (ML18291A165)	617
Gibson, Kenneth		Email (ML17112A191)	266
Gibson, Vicki		Email (ML18282A277)	430
Gideon, Amanda		Meeting Transcript (ML17061A744)	1-19
Giese, Mark M.		Email (ML17055D060)	35
Giese, Mark M.		Email (ML18289A321)	443
Gilmore, Donna	San Onofre Safety	Email (ML18354B397)	519
Gilmore, Donna	San Onofre Safety	Meeting Transcript (ML17067A323)	3-12
Gilmore, Donna	San Onofre Safety	Meeting Transcript (ML17067A323)	3-21
Gilmore, Donna	San Onofre Safety	Meeting Transcript (ML17102B446)	4-15
Gilmore, Donna	San Onofre Safety	Meeting Transcript (ML17102B446)	4-19
Gilmore, Donna	San Onofre Safety	Meeting Transcript (ML17102B446)	4-29
Gilmore, Donna	San Onofre Safety	Meeting Transcript (ML17102B446)	4-6
Givone, Shanen		Email (ML17082A601)	565
Glenn, Betsy		Email (ML19004A056)	549
Gliva, Stephen		Email (ML17054D849)	33
Glover, Richard		Email (ML18295A611)	579
Goebel, Michael		Email (ML17053D395)	187
Goetz, Linda		Email (ML17112A009)	257
Gold, Andrew		Email (ML17082A557)	555
Gold, Leslie		Email (ML17113A316)	692
Goldey, Gail		Email (ML19003A055)	547

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Gore, Jesse		Email (ML18353B560)	635
Gorman Prochaska, Pamela	Xcel Energy	Email (ML18354B240)	512
Gosslee, Susybelle	Texas League of Women Voters	Meeting Transcript (ML17062A614)	2-18
Graffagnino, Mary Ann and Frank		Email (ML17112A445)	275
Graffagnino, Mary Ann and Frank		reg.gov (ML18302A214)	421
Gray, Erica		reg.gov (ML17081A106)	144
Gray, Erica		reg.gov (ML18295A005)	403
Gray, Walter		Email (ML17102A233)	743
Green, E		Email (ML18352A091)	810
Greenwald, Janet	Citizens for Alternatives to Radioactive Dumping	Email (ML17082A568)	558
Greenwood, Carle		Email (ML17059D642)	305
Gregory, Robert		Email (ML18324A410)	631
Greiner, Stephen		Email (ML17082A616)	566
Greiner, Stephen		Email (ML18355A413)	542
Greiner, Tony		Email (ML17054D824)	220
Greiner, Tony		Email (ML17111A242)	239
Grenard, Mike Hayduke	MN Peace Group	reg.gov (ML17086A105)	147
Grisak, Gerry		Meeting Transcript (ML17061A744)	1-10
Grisak, Gerry		Meeting Transcript (ML17061A744)	1-37
Grisak, Gerry		Meeting Transcript (ML17062A614)	2-6
Grivois, Gail		Email (ML18290B197)	614
Gromoll, Norda		Email (ML18295A431)	455
Groot, Henriette		Email (ML17111B028)	253
Gross, Cheryl		Email (ML17112A081)	171
Guerrero, Felix		reg.gov (ML17081A026)	110
Guichard, Jeanne		reg.gov (ML17103A528)	153

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Guldi, Christine		reg.gov (ML17054C354)	50
Guldi, Christine		reg.gov (ML18250A225)	317
Guldi, Christine		reg.gov (ML18298A270)	413
Guldi, Richard		reg.gov (ML17081A042)	124
Gunter, Keith	Alliance to Halt Fermi 3	Email (ML18353A618)	516
Guthrie, Patricia		Email (ML17112A140)	262
Hadden, Karen	Sustainable Energy & Economic Development (SEED) Coalition	Email (ML17113B304)	157
Hadden, Karen	Sustainable Energy & Economic Development (SEED) Coalition	Email (ML17121A516)	645
Hadden, Karen	Sustainable Energy & Economic Development (SEED) Coalition	Meeting Transcript (ML17061A744)	1-15
Hadden, Karen	Sustainable Energy & Economic Development (SEED) Coalition	Meeting Transcript (ML17061A744)	1-32
Hadden, Karen	Sustainable Energy & Economic Development (SEED) Coalition	Meeting Transcript (ML17062A614)	2-10
Hadden, Karen	Sustainable Energy & Economic Development (SEED) Coalition	Meeting Transcript (ML17067A323)	3-16
Hadden, Karen	Sustainable Energy & Economic Development (SEED) Coalition	Meeting Transcript (ML17067A323)	3-31
Hadden, Karen	Sustainable Energy & Economic Development (SEED) Coalition	Meeting Transcript (ML17102B446)	4-9
Hadden, Karen	Sustainable Energy & Economic Development (SEED) Coalition	reg.gov (ML17112A588)	99
Hage, Robert		Email (ML17053A056)	23
Hale, Valerie		Email (ML18340A296)	501
HaLevy, Libbe		Email (ML18323A817)	647
Hall, Joyce		Email (ML18323A947)	463

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Hall, Robert		Email (ML17112A135)	260
Halpin, Becky		Meeting Transcript (ML17102B446)	4-20
Halpin, Beki		Email (ML18353A224)	660
Halpin, Richard		Meeting Transcript (ML17102B446)	4-24
Hancock, Don	Southwest Research and Information Center	Email (ML18282A268)	425
Hanns, Sean		Email (ML17054D167)	206
Hanratty, Linda		Email (ML17102B888)	755
Hanson, Art		Email (ML18291B061)	623
Hanson, Richard	Texas Parks and Wildlife Department	Email (ML17082A461)	529
Harman, Greg		Email (ML18353A445)	515
Harmon, Dexter	Fasken Oil and Ranch	Email (ML18288A286)	437
Harmon, Dexter	Fasken Oil and Ranch	Email (ML18338A710)	497
Harms, Annie		Email (ML18282A659)	435
Harragin, John		Email (ML17112A852)	763
Harris, Tamberlaine		Email (ML17102B716)	752
Harrison, Cody		Email (ML18289A517)	575
Harrison, Harry		Email (ML17055A046)	288
Harrison, Ian		Email (ML18289A517)	575
Hart, Marcia		Email (ML17082A506)	536
Harter, Linda		Email (ML17113B137)	718
Hatcher, Denise		Email (ML18353A180)	656
Haywood, Susan		Email (ML18289A020)	782
Haywood, Susan		Email (ML18297A247)	792
Haywood, Susan		Email (ML18352A261)	812
Headington, Maureen	Stand Up/Save Lives Campaign - Illinois	Meeting Transcript (ML17067A323)	3-19
Headington, Maureen	Stand Up/Save Lives Campaign - Illinois	Meeting Transcript (ML17067A323)	3-25
Headington, Maureen	Stand Up/Save Lives Campaign - Illinois	Meeting Transcript (ML17067A323)	3-32
Heck, Patricia		Email (ML19002A021)	676
Hedge Coke, Allison		reg.gov (ML17081A049)	131
Hedges, Charles		Email (ML18354B515)	670

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Hemmingsen, Karin		Email (ML17110A961)	758
Hempel, Drew		Email (ML18289A456)	446
Henderson, Donald		Email (ML17089A806)	382
Henry, Mayellen		Email (ML17112A242)	267
Herbold, Michael		reg.gov (ML17075A255)	103
Herd, Holly		Email (ML18347B407)	504
Herke, William		Email (ML17113B022)	715
Hershey, Michael		Email (ML17111A201)	237
Hess, Rose		Email (ML17102A307)	744
Hester, Dennis		Email (ML17113A460)	700
Hicklin, Mary		Email (ML17053D927)	190
Hicks, Tres	Economic Development Corporation	Meeting Transcript (ML17061A744)	1-5
Higgins, Mike		Email (ML17062A142)	355
Hilderbrandt, Todd		Email (ML17054C773)	203
Hill, Gregory		Email (ML17062A780)	360
Hill, Leigh		Email (ML17054C602)	199
Hocker, Emily		reg.gov (ML17081A094)	136
Hodge, Rita		Email (ML17112A179)	265
Hoegler, Jean		Email (ML17113A426)	697
Hoff, Marilyn		reg.gov (ML17081A091)	135
Hoffman, Ace		Meeting Transcript (ML17067A323)	3-18
Hoffman, Ace		Meeting Transcript (ML17102B446)	4-2
Hoffman, Ace		Meeting Transcript (ML17102B446)	4-27
Hohl, Jean		reg.gov (ML17061A196)	93
Holder, Carl		reg.gov (ML16330A497)	42
Holen, Ivend		Email (ML17112A149)	263
Hollow, Nancy		Meeting Transcript (ML17067A323)	3-4
Holmes, Joseph		Email (ML17082A473)	371

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Hooper, Maghan		Email (ML18338A609)	485
Hopper, Leslie		reg.gov (ML17081A030)	114
Horiwitz, Laura		Email (ML17112A607)	278
Horowitz, Laura		Email (ML17112A831)	761
Horowitz, Laura		Email (ML18289A979)	605
Hossaini, Janann		reg.gov (ML18295A016)	411
Hotchkiss, Sharla		reg.gov (ML17103A528)	153
House, Lorien		Email (ML18289A482)	786
Houston, Robert	U.S. Environmental Protection Agency	reg.gov (ML17087A268)	16
Howard-Winters, Karen		Email (ML17082A583)	643
Howard-Winters, Karen		Meeting Transcript (ML17061A744)	1-23
Howard-Winters, Karen		Meeting Transcript (ML17061A744)	1-36
Howard-Winters, Karen		Meeting Transcript (ML17062A614)	2-17
Howard-Winters, Karen		reg.gov (ML18306A666)	603
Huffman, Vernon		Email (ML18297A332)	459
Hughes, Jamie		reg.gov (ML17059D372)	65
Hunt, Rob	Missouri Dept. of Natural Resources	reg.gov (ML18302A218)	422
Hutto, Amy		Email (ML17113A676)	705
Hyde, Bridget		Email (ML17082A595)	562
Hyde, Bridget		reg.gov (ML17059D381)	71
Hyman, Joan		Email (ML18352B369)	509
Imam, Sara		reg.gov (ML18274A200)	323
Insurriaga, Aurora		reg.gov (ML17059D097)	61
Iseri, Martin		Email (ML17111A194)	236
Jacobs, Shannon		Email (ML17053A060)	25

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Jagiello, Carol		Email (ML18288A875)	781
Janzen, Gayle		Email (ML17113A865)	708
Janzen, Gayle		Email (ML18291A872)	622
Jeffrey, Monroe Edwin		Email (ML17113A582)	703
Jenkins, Rose		Email (ML17102A574)	226
Jenkins, Rose		Email (ML18295A771)	788
Johnson, Chuck	Oregon and Washington Chapters of Physicians for Social Responsibility	Meeting Transcript (ML17067A323)	3-7
Johnson, Molly	San Luis Obispo Mothers for Peace	Email (ML18355A033)	523
Johnston, Buck		reg.gov (ML17059D114)	82
Johnston, Buck		reg.gov (ML17081A028)	112
Jolly, Susan		Email (ML17059D961)	313
Jones, Gary		Email (ML17054D376)	208
Jones, Neal		Email (ML19002A024)	677
Jones, Richard		Email (ML17112A416)	272
Jones, Robert		Email (ML17059D800)	307
Jordan, Michael		reg.gov (ML17059D373)	66
Jurczewski, Carol		Email (ML17111A263)	240
Kallunki, Jacquelyn		Email (ML17095A964)	722
Kamps, Kevin	Beyond Nuclear	Email (ML17121A508)	28
Kamps, Kevin	Beyond Nuclear	Email (ML18355A220)	525
Kamps, Kevin	Beyond Nuclear	Email (ML18355A302)	538
Kamps, Kevin	Beyond Nuclear	Meeting Transcript (ML17061A744)	1-35
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Kamps, Kevin	Beyond Nuclear	Meeting Transcript (ML17062A614)	2-5
Kamps, Kevin	Beyond Nuclear	Meeting Transcript (ML17067A323)	3-22
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Kamps, Kevin	Beyond Nuclear	Meeting Transcript (ML17067A323)	3-8
Kamps, Kevin	Beyond Nuclear	Meeting Transcript (ML17102B446)	4-12
Kamps, Kevin	Beyond Nuclear	Meeting Transcript (ML17102B446)	4-17
Kamps, Kevin	Beyond Nuclear	Meeting Transcript (ML17102B446)	4-5
Kardos, Theresa		Email (ML17054D014)	204
Kardos, Theresa		Email (ML17061A652)	351
Kazak, Ilene		Email (ML17092A174)	388
Keller, Nina	Wendell, MA Board of Health	Email (ML18282A602)	434
Kellerman-Fullmer, Lorrie		Email (ML17082A597)	563
Kelly, J		Email (ML17058A289)	298
Kernan, Gay	New Mexico Senate	Email (ML17046A195)	18
Kershner, Harry		Email (ML17082A509)	537
Ketzenberger, Kay		reg.gov (ML17067A110)	100
Key, Charles		Email (ML17060A902)	345
Keyburn, Danna		Email (ML18353A116)	654
Kiehn, Don		Email (ML17092A166)	387
Kilgore, Chris		Email (ML16334A361)	7
Kjono, Pamela		Email (ML17100A374)	731
Klingel, Jon		Email (ML18295A720)	583
Klocke, Thomas		Email (ML17102A568)	747
Knapp, Harry		Email (ML18289A183)	785
Knapp, Harry		Email (ML18291A579)	621
Kobach, Scott	Nuclear Watch New Mexico	Meeting Transcript (ML17102B446)	4-10
Kohn, Joseph		Email (ML17112A766)	282
Koivisto, Ellen		Email (ML17112A624)	279
Kosters, Lisa		reg.gov (ML18277A231)	341
Kovac, Scott	Nuclear Watch New Mexico	Email (ML18354A222)	819
Kraft, David	Nuclear Energy Information Service	Email (ML18355A230)	527

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Kreger, Kristin		Email (ML19001A210)	675
Kreismeyer, Kathleen		Email (ML17059D809)	308
Kritzman, Ellen		Email (ML17102B948)	756
Krug, Jade		reg.gov (ML17103A528)	153
Lafave, Scott		Meeting Transcript (ML17061A744)	1-26
Laforge, John		Meeting Transcript (ML17067A323)	3-15
Laforge, John		Meeting Transcript (ML17102B446)	4-22
Laforge, John		Meeting Transcript (ML17102B446)	4-28
Laforge, John		Meeting Transcript (ML17102B446)	4-8
Lamb, Deborah S.		Email (ML17061B172)	354
Lambert, Jerrell		Email (ML18291B529)	626
Landgrebe, Bettina		reg.gov (ML17059D118)	85
Lane, Linda		Email (ML18296A843)	790
Lanthrum, Gary	NAC International	Meeting Transcript (ML17061A744)	1-8
Laughlin, Jay		Meeting Transcript (ML17062A614)	2-23
Lavonne, Nadine		Email (ML17113A047)	687
Leavell, Carroll		reg.gov (ML17054D470)	54
Ledoux, Marilyn		reg.gov (ML17060A245)	88
Lee, Catherine		Email (ML18292A517)	578
Lee, Michel	Promoting Health and Sustainable Energy	reg.gov (ML18295A015)	410
Lefler, Susan		reg.gov (ML18274A202)	325
Lemley, J		Email (ML17102B180)	749
Leonard, Zoe		reg.gov (ML17081A105)	143
Leshinskie, Tony		Meeting Transcript (ML17067A323)	3-9

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Lettieri, Tammy		Email (ML17110B083)	229
Levine, Joel		Email (ML17089A455)	380
Levine, Joel		Email (ML18289B119)	606
Lewison, Linda		Meeting Transcript (ML17067A323)	3-27
Lewison, Linda		Meeting Transcript (ML17102B446)	4-11
Limberg, Kim		Email (ML18354A905)	664
Lindhorst, Gerald		Email (ML17054C284)	195
Liska, Sabrina		Email (ML17054C296)	26
Livingston, Taylor		reg.gov (ML17059D111)	81
Lodge, Terry		Email (ML18353A717)	517
Logan, Christopher		Email (ML18324A283)	470
Lombardo, Scott		Email (ML17112A999)	286
Londrville, Irene		Email (ML17113A027)	686
Lopez, Chris		reg.gov (ML17081A023)	107
Lopez, Emma		Email (ML18338A603)	481
Lopez, Rachel		reg.gov (ML18291B047)	402
Lorenz, Margaret		Email (ML18289A219)	441
Lovegren, Sven		reg.gov (ML17059D370)	63
Lovelace, Joann		Email (ML18323A991)	464
Lowe, Patsy		Email (ML17111A100)	231
Lowe, Patsy		Email (ML18347B742)	806
Luke, Tawnya		Email (ML18338A617)	488
Luman, Exa		reg.gov (ML17059D375)	67
Lundeen, Kelly		Email (ML18282A265)	424
Luoma, Courtney		Email (ML18338A604)	482
Lusch, Mark		Email (ML17054D862)	222
Lusch, Mark		Email (ML17112A369)	269
Lusch, Mark		Email (ML17113B130)	717
Lutz, Jessica		reg.gov (ML17081A033)	117
Lynch, Francis		Email (ML18285A739)	773

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M, C		Email (ML17062A659)	358
MacKenzie, Rebecca		Email (ML17082A503)	535
MacKenzie, Therese		Email (ML17054A321)	191
Mackey-Taylor, Pam	Iowa Sierra Club	Email (ML18338A467)	476
Macks, Vic		Email (ML17054D718)	216
Macks, Vic	Michigan Stop the Nuclear Bombs Campaign	Email (ML18295A668)	574
Madden, Judy		Email (ML17060A878)	344
Madsen, Virginia		Email (ML17110A926)	40
Magne, Kathy		Email (ML17102B838)	754
Makleff, Rachel		Email (ML18323A820)	797
Makuta, Billy		Email (ML17063A281)	366
Malnati, Peggy		Email (ML17113A981)	713
Marida, Ms.		Meeting Transcript (ML17102B446)	4-7
Marquez, Noel		Meeting Transcript (ML17061A744)	1-22
Marquez, Noel		Meeting Transcript (ML17061A744)	1-38
Martin, Jeanne		Email (ML18291B686)	627
Martin, Nancy		Email (ML17087A751)	375
Martinez, Gilbert		reg.gov (ML18274A212)	332
Martinez, Gracie		reg.gov (ML18274A211)	331
Marullo, E		Email (ML18290A232)	609
Masser, Joel		Email (ML17082A562)	557
Massingill, Brad		Email (ML17082A536)	552
Mayer, Paul		Email (ML18285A701)	772
McCarthy, Peter		Email (ML18295A734)	584
McCoy, David	Citizen Action New Mexico	Email (ML18323A347)	460
McCoy, David	Citizen Action New Mexico	Email (ML18323A348)	461
McCullough, Tammy		Email (ML17054D869)	223
McDaniel, Sean		Email (ML18355B060)	544

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McDaniels, JA		Email (ML17100A348)	730
McFall, Larry		Email (ML17059D249)	300
McGaughy, Robert		Email (ML17082A499)	533
McGuire, Meredith		Email (ML18324A259)	649
McGuire, Meredith		reg.gov (ML17112A675)	59
McIntosh, Ruth		Email (ML18353A227)	661
McKee, Sarah		Email (ML17059D983)	315
McLain, Neal		Email (ML18291A478)	452
McLarty, Sara		Email (ML17082A538)	553
Meeks, Callie		reg.gov (ML17061A193)	90
Melloh, James		Email (ML17053C939)	181
Mertz, Robert		Email (ML18290A801)	610
Metzger, Bayla		reg.gov (ML17048A173)	47
Meyer, Alfred		Email (ML17061A490)	350
Meyer, Alfred		Meeting Transcript (ML17067A323)	3-17
Michetti, Susan		Email (ML17112A844)	285
Michetti, Susan		Email (ML17112A847)	762
Michetti, Susan		Email (ML18323A953)	800
Mikowski, George		Email (ML17113A444)	699
Milford, Joan		reg.gov (ML18274A201)	324
Miller, Howard R.		Email (ML17062A713)	359
Miller, Kirk		Email (ML18353A282)	514
Miller, Phyllis		Email (ML17054C655)	201
Milner, Jenna		Email (ML17061A887)	352
Minniss, Regina		Meeting Transcript (ML17067A323)	3-20
Minniss, Regina		reg.gov (ML17109A356)	158
Mirfield, Paulette		Email (ML17063A034)	362
Mitchell, Genie		Email (ML18338A674)	494
Moloney, Dorothy		Email (ML19004A017)	685
Monroe, Rachel		reg.gov (ML17059D115)	83

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Montiel, Yvonne		Meeting Transcript (ML17062A614)	2-4
Moore, Philip		Email (ML18352A932)	813
Morey, Sandra		Email (ML17053D027)	184
Morgan, Dawn		Email (ML17094A919)	392
Morgan, Laura		reg.gov (ML17103A528)	153
Morgan, Leona		Meeting Transcript (ML17067A323)	3-3
Morgan, Leona	Nuclear Issues Study Group	Email (ML18355A347)	540
Mosca-Clark, Vivianne		Email (ML17096A127)	725
Mosca-Clark, Vivianne		Email (ML17112A596)	760
Mosimann, Edward		Email (ML19003A007)	679
Moss, Sharon		Email (ML18297A238)	791
Muhich, Mark		reg.gov (ML17081A039)	121
Mulcihy, David		reg.gov (ML18274A213)	333
Nakakihara, Karen		Email (ML18282A276)	429
Naylor, Bryan		reg.gov (ML18264A193)	318
Nelson, Dennis		Email (ML17111A368)	246
Nelson, Dennis		Email (ML18323A767)	795
Nepstad, Greg		Email (ML18338A667)	492
Nessanbaum, Bonnie		Email (ML17095A981)	723
Neuendorff, David		Email (ML17095A925)	394
Neumann, Linda		Email (ML17124A701)	769
Nichols, Diann		Email (ML17040A216)	13
Nicol, Ricardo		Email (ML17082A474)	531
Noel, Susan		Email (ML17112A812)	283
North, John		Email (ML17082A529)	551
Notkin, Debbie		Email (ML17059E151)	38
O'Connell, William		reg.gov (ML18302A221)	423
O'Dear, Elizabeth		Email (ML17111A526)	170

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Oakes, John		Email (ML17054D788)	219
Obgonna, Joseph		Meeting Transcript (ML17062A614)	2-29
ODear, Elizabeth		Email (ML17054D658)	213
Ogilvy, Avis		Email (ML18291A077)	616
Oliver, Gary		reg.gov (ML17081A048)	130
Olson, Mary	Southeast Office of Nuclear Information and Resource Service	Meeting Transcript (ML17067A323)	3-2
Ortiz, Guadalupe		reg.gov (ML18277A228)	338
Otter, John		Email (ML17112A644)	172
Ovenshire, Ruthann		Email (ML17059D957)	312
Owens, Krista		Email (ML17063A616)	368
P, Abbie		reg.gov (ML17081A035)	119
Pace, Amanda		reg.gov (ML17059D101)	74
Paddock, Brian		Email (ML18347B399)	634
Padilla, Elizabeth		Email (ML18297A271)	586
Padilla, Elizabeth		Meeting Transcript (ML17062A614)	2-1
Paige, Nieba		Email (ML17111A374)	247
Pais, Gregory		Email (ML17053D833)	188
Palla, Paul		Email (ML17062B194)	361
Palla, Paul		Email (ML17113A191)	690
Palla, Paul		Email (ML18323A860)	798
Panfilio, Carol		Email (ML17112A410)	271
Parker, Sheila		Meeting Transcript (ML17061A744)	1-21
Parks, Sheila	On Behalf of Planet Earth	Meeting Transcript (ML17067A323)	3-11
Patrie, Lewis		Email (ML18324A292)	471
Patterson, Carol		Email (ML17112A925)	765
Patterson, Cynthia		Email (ML18354B511)	521
Peace, Annalisa		reg.gov (ML17067A111)	101

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Peddicore, Lee		Meeting Transcript (ML17062A614)	2-32
Peil, Cynthia		Meeting Transcript (ML17102B446)	4-4
Peil, William		Meeting Transcript (ML17102B446)	4-13
Peil, William		Meeting Transcript (ML17102B446)	4-23
Peil, William		Meeting Transcript (ML17102B446)	4-3
Peters, John		Email (ML17089A399)	379
Peterson, Jan		Email (ML17111B059)	254
Picketts, Sherra		Email (ML18292A196)	453
Pikus, Barbara		Email (ML17102B111)	748
Pineda, Cecile		Email (ML18289A607)	451
Poland, Amanda		reg.gov (ML17081A022)	106
Poplawski, Leslie		Email (ML18289A578)	450
Post, Fran		Email (ML17054D651)	211
Powell, Shirley		Email (ML18290B132)	612
Pradon, Suzette		Email (ML18282A299)	433
Probandt, Julie		Email (ML18324A397)	474
R, Ann		Email (ML18355A922)	641
Raceles, Donna		Email (ML18354B027)	639
Rakaczky, Rachael		Email (ML17121A466)	720
Ralston, Valerie		Email (ML17100B059)	735
Ramos, Raymond		Meeting Transcript (ML17062A614)	2-24
Ramsay, Rebecca		Email (ML17110A993)	41
Ramsay, Rebecca		Email (ML18292A535)	454
Ramsey, Betty		Email (ML17054D399)	209
Raven, Robert		Email (ML18288A816)	778
Reade, Deborah		reg.gov (ML17081A090)	134
Reed, Cyrus	Sierra Club, Lone Star Chapter	Meeting Transcript (ML17067A323)	3-5
Reed, Cyrus	Sierra Club, Lone Star Chapter	reg.gov (ML17122A283)	161

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Reefe, James		Email (ML18355A133)	674
Refes, N		Email (ML17054D771)	218
Refes, N		Email (ML17062A262)	357
Refes, N		Email (ML17113A979)	712
Reid, Gerald	KACT AM/FM	reg.gov (ML17074A217)	104
Reilly, Linda		Email (ML17113A334)	694
Renzoni, Dante		Email (ML17112A116)	259
Reynolds, Patricia		reg.gov (ML17118A068)	159
Rice, Chad		Email (ML18353A223)	513
Rice, Donna		Email (ML18338A703)	496
Rice, Nancy		Email (ML18288A836)	779
Richardson, Don		Email (ML18295A730)	456
Richardson, Forrest		Email (ML18290B227)	615
Ridenour, Patty		Email (ML17094A014)	391
Riley, Darby		reg.gov (ML18299A222)	418
Rivera, Ethyl		reg.gov (ML17081A101)	140
Roberts, James		Email (ML18289A278)	442
Roberts, Sally		Email (ML17088A342)	377
Robinson, Lemuel		Email (ML17097A493)	728
Rodriguez, Raul		reg.gov (ML18288A014)	397
Rogers, Robbie	Andrews Economic Development Board	Meeting Transcript (ML17062A614)	2-28
Rojeski, Mary		Email (ML17055A100)	289
Rosen, David		Meeting Transcript (ML17061A744)	1-12
Rosen, David		Meeting Transcript (ML17062A614)	2-7
Rosen, David		Meeting Transcript (ML17067A323)	3-23
Rosen, David		reg.gov (ML18291A671)	399
Rosenbaum, Harold		Email (ML18352A217)	811

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Rousu, Dwight		Email (ML17112A620)	273
Ruffin, Minnie		Email (ML18355A227)	526
Rutkowski, Robert		Email (ML18284A034)	436
Ryan, Carolyn		reg.gov (ML17103A528)	153
S, J		Email (ML17040A217)	14
Sabin, Alberta		Email (ML17061A373)	348
Sachs, G		reg.gov (ML17067A113)	102
Saltzman, Dale		Email (ML17054D825)	32
Sanchez, Elicia	Waste Control Specialists	Meeting Transcript (ML17061A744)	1-11
Sanchez, Melissa		Email (ML18323A422)	646
Saxon, Mary Lou		reg.gov (ML17048A175)	49
Sayre, Johannes		reg.gov (ML18275A027)	335
Scanlon, Dave		Email (ML17101A088)	740
Schafersman, Steve		Meeting Transcript (ML17062A614)	2-14
Schafersman, Steven		reg.gov (ML18295A013)	408
Schepart, Kim		reg.gov (ML17074A215)	103
Schmertzler, Alvin		Email (ML17088A412)	378
Schneekloth, Lynda		Email (ML17112A816)	284
Schneider, Ginny		Email (ML17054C292)	196
Schoenberg, Arnie		Email (ML18282A520)	651
Schoene, Bill		Email (ML17102A538)	746
Schonberger, David		Meeting Transcript (ML17067A323)	3-10
Schonberger, David		Meeting Transcript (ML17067A323)	3-33
Schonzeit, Sam		reg.gov (ML17059D108)	79
Schrader, Phillip		reg.gov (ML18274A206)	326
Schultz, Sara		reg.gov (ML17059D104)	77

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Schuster, Phyllis		Email (ML19003A625)	680
Schwartz, Alexander and Suzanne		Email (ML17112A748)	174
Schwarz, Natalie		Email (ML18338A669)	493
Schwarz, Patricia		reg.gov (ML17081A096)	137
Sculley, Sheryl	City of San Antonio	reg.gov (ML17128A395)	164
Sebring, Earl		reg.gov (ML18311A311)	590
Seeley, Linda		Email (ML18355A455)	543
Shaffer, Mary		reg.gov (ML17081A032)	116
Shapiro, Susan		Email (ML18347B311)	804
Sharp, Rebecca		reg.gov (ML18274A215)	334
Shaughnessy, Eileen		Email (ML18353A636)	662
Sheely, Patricia		Email (ML17111A185)	234
Sheely, Patricia		Email (ML19004A079)	683
Sheldon, Connie		Email (ML17040A211)	10
Shelley, Adrian	Public Citizen Texas Office	Email (ML18355B063)	545
Sherman-Rogers, Carol		Email (ML17040A215)	12
Simmons, William		Email (ML18354B150)	665
Simon, Daniel		Email (ML17112A137)	261
Simpson, Robert		Email (ML18289A081)	783
Simpson, Robert		Email (ML18352A743)	508
Sims, Cathy		Email (ML17054C267)	194
Sims, Gail		Email (ML18338A602)	480
Singleton, Robert		Email (ML17112A528)	20
Sis, Michael	Diocese of San Angelo	reg.gov (ML18310A192)	589
Slama, Cody		Email (ML17082A617)	567
Slama, Cody		Email (ML18353A174)	655
Slama, Cody		Meeting Transcript (ML17067A323)	3-13

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Smith, Barbara		Email (ML17113A940)	711
Smith, Courtenay		Email (ML18292A094)	628
Smith, Craig		Email (ML18289A488)	447
Smith, Jean		Email (ML17093A064)	390
Smith, Linda		Email (ML18351A384)	807
Smith, Roger		Email (ML17115A513)	178
Smith, Roger		Email (ML18289A091)	439
Smith, Sue		Email (ML17046A193)	17
Smith, Tom		Meeting Transcript (ML17102B446)	4-14
Smith, Tom	Public Citizen	Meeting Transcript (ML17061A744)	1-13
Smith, Tom	Public Citizen	Meeting Transcript (ML17062A614)	2-8
Smith, Vicki		Email (ML17055B011)	291
Snyder, Brad		Email (ML17061A266)	346
Snyder, Gail	Nuclear Energy Information Service	Meeting Transcript (ML17102B446)	4-26
Snyder, Melanie	WIEB HLRWC	reg.gov (ML18291B045)	401
Southworth, Kari		Email (ML17059D840)	310
Spigel, Stuart		reg.gov (ML18270A027)	319
St. John, Aaron		Email (ML18290A105)	608
Stambaugh, Ruth		Email (ML17087A418)	373
Stanley, MaryJo		Email (ML17063A143)	365
Stanley, Patricia		reg.gov (ML17103A141)	155
Stark, Tom		Email (ML17059D383)	303
Stearns, Wendy		Email (ML18274A325)	167
Stein, Robert		reg.gov (ML18288A008)	395
Stein, Robert		reg.gov (ML18292A223)	395
Stevens, Daphne		Email (ML17111A343)	244
Stevens, Daphne		Email (ML17112A752)	281
Stevens, Fred		Email (ML18354B357)	667
Stevens, Gavi		Email (ML17063A077)	363

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Stevens, Patricia		reg.gov (ML17061A199)	96
Stevens, Patricia		reg.gov (ML17103A528)	153
Stevens, Robert		reg.gov (ML17103A528)	153
Stewart, Barbara		Email (ML18296A457)	457
Stewart, Bob	Soil and Water Conservation District of Andrews TX	Meeting Transcript (ML17062A614)	2-25
Stone, Lisa		Email (ML18292A459)	642
Stout, Ivan		Email (ML17112A065)	258
Strawn, Mike		Email (ML17112A511)	277
Struebing, Wesley		Email (ML17059D921)	311
Stuart, Jeff and Ann		Email (ML18289A158)	440
Sturm, Lois		Email (ML17112A967)	175
Suellentrop, Ann		Email (ML17054D374)	207
Sullivan-Greiner, Sadie		Email (ML17054A579)	192
Sulock, Dot		Email (ML18289A323)	444
Susman, Joan		Email (ML18353A190)	658
Sweet, Midge		Email (ML18355A052)	671
Tarpley, Wesley		Email (ML18282A279)	431
Taylor, Tommy	Fasken Oil and Ranch, Ltd	Email (ML18354B349)	491
Telford, Elizabeth		Email (ML18353A201)	659
Tellez, Gerald	City of Pecos	Meeting Transcript (ML17062A614)	2-34
Ternamian, Brian		Email (ML17055D225)	296
Terry, Nick		reg.gov (ML17059D117)	84
Thatcher, Tami		reg.gov (ML18324A765)	599
Thomas, Gretchen		Email (ML18285A920)	774
Thomas, Stephanie		Email (ML18355A008)	522
Thomason, Twilla		Meeting Transcript (ML17061A744)	1-7
Tinker, Paul		Email (ML17062A258)	356
Torres, Ricardo		Email (ML18338A691)	495

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Tracy, Robert		Email (ML17060A863)	343
Travis, Terry		Email (ML17054C820)	29
Trevino, Diane		reg.gov (ML17081A097)	138
Tronolone, Carmine		Email (ML17059D831)	309
Tuma, Richard		Email (ML17054C384)	5
Turchinetz, Mimi		reg.gov (ML17128A398)	166
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Vorachek, Mary		Email (ML18347B691)	805
Vota, Christopher		Email (ML17102B811)	753
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West, Kristin		Email (ML17061A889)	225
Westbrook, Bonnie		Email (ML17059E026)	316
Wheeler, Susie		reg.gov (ML18277A225)	337
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Winters, Lee		reg.gov (ML18305A256)	601
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Young, Ron		Email (ML18360A525)	546
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Zepeda, Donald		reg.gov (ML17059D380)	70
Ziegel, Robert		Email (ML17055C041)	293
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