

SUNSI Review Complete
 Template = ADM-013
 E-RIDS=ADM-03
 ADD: Jill Caverly

As of: 4/10/20 10:40 AM Received: April 10, 2020 Status: Pending_Post Tracking No. 1k4-9g1p-zk3b Comments Due: May 22, 2020 Submission Type: Web

PUBLIC SUBMISSION

COMMENT (13)
 PUBLICATION DATE:
 3/20/2020
 CITATION 85 FR 16150

Docket: NRC-2018-0052

Holtec International HI-STORE Consolidated Interim Storage Facility Project

Comment On: NRC-2018-0052-0300

Holtec International HI-STORE Consolidated Interim Storage Facility Project

Document: NRC-2018-0052-DRAFT-0321

Comment on FR Doc # 2020-05690

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General Comment

NRC-2018-0052 Reason four: New Mexico already knows how to transport and store radioactive transuranic waste - WIPP.

When it comes to knowing "how" to stored nuclear waste, New Mexico was on the forefront building the most expensive deep repository in the world. Whenever you are the first at anything, you probably paid a lot of costs that were experimental. That is exactly why WIPP was called a waste isolation "pilot" project. After 20 years, a lot has been learned and a lot of money (tens of billions) has been spent to make this facility functional and "safe".

The real question to be asking today, 20 years later, was it really necessary to store radioactive clothes and tools laced with a few transuranic isotopes, like plutonium and americium, 2150 ft below ground in a creepy salt formation for permanent storage?

Does that mean we have to do it all over again for spent nuclear fuel? - NO!

While WIPP has been very successful in what it was designed to do, store transported transuranic waste material from DOE sites around the country, it did have one minor mishap in 2014. There were no health or environmental detriments, but it did cost the DOE hundreds of millions of dollars to clean up and reopen for business three years later. That cost was because it was 2150 ft below ground. The annual budget to just

maintain WIPP is also very expensive, like over a billion dollars.

When it comes to transuranic waste and other low-level waste, a facility like Waste Control Specialist (WCS/ORANO) in West Texas, with its dense red clay, would have been a better economical and environmental solution to WIPP. The minor leak at WIPP in 2014 would have been detected immediately and resolved within days for pennies on the dollar compared to the DOE cost at WIPP. But this is hindsight speculation.

The HI-STORE CISF, a sub-surface solution, utilizes Holtec's HI-STORM UMAX vertical ventilation dry storage system, which is engineered to be immune to extreme environmental phenomena, such as hurricanes, floods, tornadoes, and earthquakes. The canisters are stored in underground, concrete and steel cavities making them essentially impenetrable. Basically, it is just as safe as WIPP, only not 2150 ft below ground. The operating cost for HI-STORE CISF over 40 years is about the same as one year operating budget at WIPP.