



**EDDY-LEA ENERGY ALLIANCE
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April 8, 2020

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Jeff Baran, Commissioner
Annie Caputo, Commissioner
David A. Wright, Commissioner
U.S. Nuclear Regulatory Commission
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Via email only to Chairman@NRC.gov, CMRBARAN@nrc.gov, CMRCaputo@nrc.gov,
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ADD: Jill Caverly

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Annette Vietti-Cook, Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Via email to annette.vietti-cook@nrc.gov

*SUBJECT: Docket ID NRC-2018-0052, Holtec International HI-STORE Consolidated
Interim Storage Facility Project (Request a reasonable DEIS public comment period and
convening of public hearings by video-conferencing at previous New Mexico sites)*

Dear NRC Commissioners:

The following Members of the Eddy-Lea Energy Alliance including; City of Carlsbad, City of Hobbs, Eddy County, Lea County all in New Mexico, their elected members of their councils and commissions as well as the eight board members of the Eddy-Lea Energy Alliance all want to be as transparent as possible. To be sure we, as well as the NRC and Holtec are anxious to be presented with any scientific, evidenced based information dispelling the findings of the DEIS.

So far, all that has been presented by those that oppose the project are non-technical emotional attitudes with no real basis for their opposition.

It is clear those opposing the project are doing it for no other reason than delay. Asking for extensions and using any motive they are able to conceive to delay the EIS process is a normal, old, tired tactic. We would submit to you the following points related to the hearing process:

- An extended period for comment for another 60 days up to 120 days seems reasonable provided the NRC does not believe this extension will cause delay.
- Public hearings via tele-communications or other such medium platforms are much more effective than public hearings in person for a number of reasons:
 - The same people are only able to speak once and they are not able to crowd out the locals where the hearing is proposed, which is to hear from the local population.
 - Those opposing the project move from hearing location to hearing location saying the same thing over and over again and then claim to have this large number opposing the project when there are only a few.
 - The in person public hearings are made into a circus by those opposing the project with blow-ups, tee shirts, songs, chants, booing, clapping and many other demonstrations that have nothing to do with the seriousness of the project hearings.
- And furthermore, electronic medium hearings:
 - Provide for a much broader possibility for comments from a much larger New Mexico platform.
 - The venue would mean people presenting would be serious and spend more time preparing their remarks.
 - The nature of the venue creates a serious attitude by those presenting to provide technical information, rather than embarrassing themselves with comments that have no basis for opposing the project.
 - The many complaints regarding transportation are not relevant to the DEIS other than the 4-mile rail spur.
 - Legal theory arguments can be made with proper citations submitted as appropriate presentations by e-mail.

We, therefore, strongly recommend the NRC establish dates for the public in person hearings that can be focused on the previous five specific areas of New Mexico to give those residents ample opportunity to express their support or concerns for the project through a telecommunication platform. Since transportation is not part of the application other than the 4-mile spur to the project location. Therefore, we would assert a national comment hearing would be inappropriate and uncalled for.

Those that are writing you in hopes of delaying the EIS process are very sophisticated political operational organizations, and, frankly, they have no basis for complaining that their members are unable to access an online hearing process. Arguments they have no internet access or can't afford it is specious, to say the least, when they seem to be able to attend meetings as far as 400 miles away from their home bases with no financial distress. We would ask that you move forward with your process expeditiously in order for you to receive comments and complete the EIS.

Best regards



John A. Heaton, Eddy-Lea Alliance Board Chairman