

**From:** Sharon S Smock <sksully02@me.com>  
**Sent:** Wednesday, April 22, 2020 9:12 PM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Response to Holtec proposed High-Level Radioactive Waste Storage Interim Proposed Project EIS

The bottom line is this EIS is much smaller and less detailed to the very extensive one for Yucca Mountain.

My concerns have been submitted but I have this opportunity to add to those comments. That is the nature of this project is interim. No one knows how long those dry casks will be sitting in varying environmental conditions. According to a Stanford study dry caskets should only be used temporarily, and in that there is no data how long they will last. Also these dry caskets can be pierced and are subject to terrorism attacks. This is another Pilot Project with rushed answers and very little interaction with the public on the proposed project. WIPP went in during bad economic times when the potash mines were closing. Now we have a pandemic and low demand for oil. Yes, again the area will be economically depressed and only a handful of politically powerful men are pushing for this with their Lea-Eddy Coalition. New Mexico and various other cities throughout the state are not for this proposed project.

Nevada has a huge site way away from everything deep underground repository ready to go yet the issue has become political. Really? The millions spent on the project then the issue is so easily dropped because they changed their mind? What about their patriotism? That one can be interim, if permanent has been refused. But permanent is preferred and just use security at your sites around the USA until a place can be found for it. Much more studies have been done on that site.

This is not something that should be rammed down a politically weaker state with a Republican president. No permanent spot has been acknowledged around the world and yes, not just here, but all around the world, of waste could be safely deposited we would have much more nuclear energy. But so far it has been proven in France and elsewhere that no one wants the waste permanently sited and there are no guarantees it is safe because no one has done a permanent storage method, or even one that has been purposely built as permanent. France recycles and produces much less, and less high radioactivity, and they are close to putting their waste in a Geologic facility like Yucca Mountain.

The threat of Terrorism is a big factor In the decision of where the waste is deposited not just in place, but also transportation. An excerpt from a journal piece says it all: "If enacted, [the centralized interim storage plan] would launch unprecedented numbers of risky high-level radioactive waste shipments, by truck, train and barge, onto our country's roads, rails and waterways," said Kevin Kamps, a radioactive waste specialist with Beyond Nuclear.

Materials might need to be moved once to an interim site and again later if and when a permanent repository becomes available, increasing its vulnerability to terrorist attacks, Kamps said. In the event of a successful attack, harmful radiation would be released into the surrounding environment, activists fear.

Kamps predicted these deliveries would take decades, meaning waste would continue to pile up at reactor sites in a manner that watchdog groups argue is unsecure. Spent fuel pools, for example, are vulnerable to fires and terrorist assaults, they say.

“The risk of accidents, attacks and externally radioactively contaminated shipments means high-level radioactive waste transportation cannot be entered into for no good reason, such as nuclear industry lobbyists’ pressure to transfer title and liability for the wastes from the utilities that profited from its generation onto the American taxpayer,” Kamps said.

Kamps, along with [other activists](#), argued instead for beefing up nuclear waste security at reactor sites until a secure and permanent repository is ready. In addition to the concerns about spent fuel pools, dry cask containers, which are sometimes used to store or ship spent fuel after it is removed from the pools, are not strong enough to withstand impact from armor-piercing weapons, Kamps contended.

The advocate for enhanced nuclear waste security said a 1998 test conducted at the U.S. Army’s Aberdeen Proving Ground in Maryland showed a German dry cask container does not hold up against antitank missiles. Kamps said casks typically used in the United States have even thinner walls than the German model.

“An explosive and incendiary attack against one or more dry casks could ignite the irradiated nuclear fuel inside, resulting in a disastrous release of volatile radioactivity, including a large fraction of the hazardous ... cesium-137 content,” Kamps said. Cesium-137 has a half-life of 30 years and is known to collect in muscle tissue.

In addition, the Nuclear Waste Policy Act states that if waste is consolidated at a central point it must be permanent, not interim. Please reference: <https://www.nirs.org/campaigns/dont-waste-america/cis/>. New Mexico has contributed enough to the nation's stockpile of radioactive materials, and WIPP which is a 1/2 mile deep, it is not built for high radioactive waste. So how is a surface interim facility safe for 30-50 years? Although there are known protocols, managing radioactive waste still poses a conundrum: cooling of spent fuel takes an inordinate amount of time and there is no known, long-term resolute solution for its disposal. Fuels in France are cooled for decades in 4 meter pools and the need for a long term facility is not yet immediate. And fit now the plan is a deep geologic facility with many tunnels. The national decision drove the establishment of a plan for €25bn, 500m underground rock laboratory in eastern France situated in clays and known as the Industrial Centre for Geological Storage (Cigéo). The structure will comprise hundreds of storage tunnels covering a total area of 25km<sup>2</sup> and will last for a century. Yet with that their population is fighting this idea as well. So the solution is to convince people it is safe and that has not been done yet, by any country. Fukushima showed the world some of the devastating possibilities if it all goes wrong. Nuclear is one of the most regulated industries in the world and will likely remain that way. There is no immediate threat, but for now, as in France, the interim spots are the 120 spots where they lay across the country. No transportation needed. Make them safe and hire security. No central interim has been tried anywhere and it would be crazy to transport the waste twice, and in whose lifetime?

This is a consent based proposed project and I do not give my consent. So many mitigations would make this proposed project too prohibitive. This proposed project has a huge negative correlation for the reasons given, and I recommend the No Action Alternative.

Sincerely,

Sharon S Smock

Las Cruces, NM

575-520-9159

Sent from my Skully's iPhone

**Federal Register Notice:** 85FR16150  
**Comment Number:** 25

**Mail Envelope Properties** (03EBE34F-C16D-471B-9DCB-61D1BE3DC804)

**Subject:** [External\_Sender] Response to Holtec proposed High-Level Radioactive Waste Storage Interim Proposed Project EIS  
**Sent Date:** 4/22/2020 9:11:37 PM  
**Received Date:** 4/22/2020 9:11:45 PM  
**From:** Sharon S Smock

**Created By:** sksully02@me.com

**Recipients:**

**Post Office:** me.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	6914	4/22/2020 9:11:45 PM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**