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Holtec International HI-STORE Consolidated Interim Storage Facility Project

Comment On: NRC-2018-0052-0300

Holtec International HI-STORE Consolidated Interim Storage Facility Project

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Submitter Information

Name: Laura Hanks

Address:

6281 SE Deering Ct.
 Milwaukie, OR, 97222

Email: laura.hanks@comcast.net

General Comment

I am opposed to the Holtec nuclear waste storage facility proposal for the following reasons: NRC's time-limited focus on just 40 years of "temporary storage" is inappropriately short, given Holtec's own admission in its license application to NRC that "interim storage" could persist for 120 years; in response to a Request for Information from DOE, Holtec admitted a CISF could operate for 300 years; and in NRC's own 2014 Continued Storage of Spent Nuclear Fuel Rule and Generic EIS, the agency acknowledged away-from-reactor ISFSIs (Independent Spent Fuel Storage Installations) could go on indefinitely (that is, forevermore). Institutional control could be lost over such long time periods. Failed containers could release catastrophic amounts of hazardous radioactivity directly into the surface environment, to blow downwind, flow downstream, bioconcentrate up the food chain, and harm people down the generations.

I also would like to point out NRC's woefully inadequate, to nearly non-existent, treatment of highly radioactive waste transport risks. This violates the long-established legal requirement under the National Environmental Policy Act (NEPA) that NRC take a "hard look" at the Holtec CISF proposal, including its inextricably linked high-risk transportation component, impacting most states in the Lower 48.

Furthermore, inner canisters will have to be transferred (from on-site storage dry casks, to transfer casks, to transport casks, to transfer casks, to CISF storage pits (and then, if and when high-level radioactive wastes are exported to a permanent repository, the reverse process) multiple times; yet, NRC is not requiring Dry Transfer Systems, so there will be no way to deal with failed fuel or containers, as well as leaks or

contamination.

Finally, there is the issue of NRC staff's internal contradiction: it is willing to overlook this CISF's violation of the Nuclear Waste Policy Act of 1982, as Amended (which prohibits the U.S. Department of Energy from taking ownership of commercial irradiated nuclear fuel at an interim site in the absence of an open permanent repository), while citing in the DEIS that the lack of clear legal authority re: Greater-Than-Class-C "low-level" radioactive waste means it will refrain from reviewing that aspect of the proposal.

Thank you for considering my point of view.