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

COMMENT (37)
PUBLICATION DATE:
3/20/2020
CITATION 85 FR 16150

PUBLIC SUBMISSION

As of: 5/5/20 9:10 AM
Received: May 03, 2020
Status: Pending_Post
Tracking No. 1k4-9ghd-xdh7
Comments Due: July 22, 2020
Submission Type: Web

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-0345
Comment on FR Doc # 2020-05690

Submitter Information

Name: Cullen Atwood

General Comment

I do not mind the proposed Holtec International HI-STORE Consolidated Interim Storage Facility Project for a variety of reasons. The main reason is because of the Nuclear Waste Policy Act of 1982 (NWPA). Obviously, nuclear waste is harmful to the environment and human health, which is why many people are skeptical about it. But the NWPA has created guidelines and safety standards that ensure nuclear waste is handled accordingly. There is a reason why western states such as New Mexico are selected for nuclear waste storage or disposal sites.

Sites are not just selected at random. When they are selected, an environmental assessment must be done to determine if any environmental hazards or risks have the potential to damage waste canisters, and thus releasing nuclear waste into the environment where it may harm humans. This is actually what the Nuclear Regulatory commission (NRC) is issuing for us to assess here. The main goal of the NWPA is to develop geologic repositories for permanent waste disposal, which means deep underground disposal sites. The process of determining those sites is the same for this Holtec project, just not in a permanent geologic repository, and instead in CISFs. Thompson, (2008) explains how the NWPA implemented the precautionary principle approach when it came to determining if Yucca Mountain (located in Nevada) should be the permanent geologic repository in the United States. An enormous amount of scientific evidence went into that project since 1987 and Yucca became the most popular site for waste disposal by the US government because scientific evidence favored the site highly. However, scientific studies that suggested Yucca had issues began to come up, which ultimately put the Yucca Mountain Project on hold, even to this day (Thompson, 2008). This just goes to show how serious the site selection process is. In fact, Holtec International's website states that the CISF site is on a small and isolated portion of a thousand acres of undeveloped land that is geographically stable (Holtec International, 2020).

The NWPA also allows the public to comment on such proposed projects like this one, which makes the site selection process more fair and safe. One of the best achievements of the NWPA is the inclusion of Native American tribes in the site selection process (Hovis, 1988). If any tribe has an objection to Holtec's CISF site, their voice would be heard and depending on the discussions or negotiations, either the site would be terminated or the tribes would be given federal grants (Erikson and Chapman, 1993, Hoffman, 2001, and Hovis, 1988).

According to the International Atomic Energy Agency (IAEA), the process of generating, processing, transporting, and storing/disposing nuclear waste is becoming more safe. This is done by waste characterization, which is a way to accurately assess the physical, chemical, and radiological characteristics of waste (IAEA, 2007). So if one of the main concerns with a project like this is the risk of something happening to the waste in transport to the Holtec CISF, it does not need to be. Each type of waste would have a procedure in place to prevent any catastrophic thing from occurring, while in transport.

The NWPA and nuclear waste storage/disposal advancements have really made the whole process a lot more safe. As long as the Environmental Impact Statement for the Holtec project concludes that it is safe to create a CISF and no Native American tribe is objecting, then I think it is ok.

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