

**From:** Ned Flaherty <Ned\_Flaherty@msn.com>  
**Sent:** Tuesday, June 16, 2020 9:40 PM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] RE: COMMENT on the Draft Environmental Impact Statement (DEIS) Docket No. 72-1050; NRC-2016-0231

U.S. Nuclear Regulatory Commission (WCS CISF)

RE: RE: COMMENT on the Draft Environmental Impact Statement (DEIS) Docket No. 72-1050; NRC-2016-0231

Dear ,

RE: COMMENT on the Draft Environmental Impact Statement (DEIS) Docket No. 72-1050; NRC-2016-0231 Interim Storage Partner's license application to construct and operate a Consolidated 'Interim' Storage Facility (CISF)

To: Nuclear Regulatory Commission

Extend Comment Period//Hold Public Meetings in Texas and Along all Transport routes

Over 80 public interest organizations requested that NRC suspend all activities involving public input until the pandemic ends, and then allow 6 months for public participation. I urge you to extend the comment period 6 months, and hold local, public DEIS meetings as soon as safe in communities along the potential transport routes in Texas (Dallas/Ft Worth, San Antonio, El Paso, Midland, Andrews) and other corridor states, especially in large urban areas.

DEIS Violates National Environmental Policy Act by Segmenting and not including Transport impacts

The DEIS does not show all the potential routes that radioactive waste would travel to get to the ISP site in Andrews County, TX, and it dismisses the risks from transport even though transport is essential to get waste there. The analyses of the substantial risks of these shipments through most states, over decades, is inadequate.

Thousands of shipments, each with more radioactive cesium than was released from Chernobyl, and more plutonium than was released at Nagasaki, would move on our roads, rails, and waterways, through most states and Congressional districts for decades. Each shipment's radioactivity can destroy the regions through which it moves, due to accident, terrorism, or sabotage. Even routine transport containers would still emit radioactivity because full shielding is too heavy to travel. Revise the DEIS to fully consider more shipment miles, years, and risks of moving waste to a final site. This is an essential part of the overall purpose of an "interim" storage license.

Environmental Justice Violations

I oppose bringing the most deadly U.S. nuclear waste (comprised of more than 90% of the radioactivity in nuclear power and weapons waste) to and through communities of color. The WCS/ISP area is largely Hispanic, and already has numerous other industrial facilities emitting radioactive and other chemical emissions, so the proposed facility would dramatically increase already disproportionate impacts. Environmental injustice is one of the most important reasons why NRC should reject the application.

NRC should publish all documents in Spanish.

NRC must Meaningfully Consider Alternatives

Rather than consider alternatives to moving waste across the country to a consolidated location, the DEIS only considers other consolidation options; it does not analyze NOT proceeding with consolidated "interim" storage and providing safer nuclear waste management at or near the generation sites. The DEIS dismisses on-site and near-site storage options merely because they are not consolidated storage (which is unlawful), without full analysis as NEPA law requires.

Threatens Water

Revise the DEIS to adequately assess the radioactive threats: (a) to water at and near the proposed site, including the nearby Ogallala Aquifer which spans 8 states, and (b) in transport on and near water bodies including the Great Lakes, Chesapeake Bay, rivers, lakes and oceans. Texas technical reviewers recommended rejecting a license for "low-level" radioactive waste at this same site because it can not protect the water.

Inadequate Storage and Transport Containers

Although NRC "certifies" containers, the irradiated fuel cannot be monitored, inspected, repaired or maintained. No containers will last as long as irradiated ("spent") fuel remains dangerous and deadly. There is no plan at ISP for re-containerizing damaged and worn out containers, even though the site could become a de-facto permanent site. In the absence of fuel pools, NRC must require dry transfer facilities so the irradiated fuel can be remotely moved to new, better containers, but these facilities were omitted.

The inconsistent predicted lengths for the "interim" storage period range from several decades, to multiple centuries, to even de-facto permanent timeframes that could dangerously exceed the design and service life of the containers and site design.

Transport casks are not designed to meet real world conditions of actual roads, rails, and waterways.

Do not curtail the EIS process due to June 4, 2020 Executive Order

No emergency circumstances exist that would justify NRC gutting or bypassing NEPA, 42 U.S.C. § 4321 et seq., or the Endangered Species Act.

I oppose any NRC attempt to curtail or limit a thorough, deliberative inquiry under NEPA and ESA into all environmental impacts likely to be caused by licensing, construction, and operation of the ISP Consolidated "Interim" Storage facility.

Sincerely,

Sincerely,  
Mr. Ned Flaherty  
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