From: Michael Lombardi <mike.lombardi@rcn.com>
Sent: Tuesday, June 16, 2020 3:57 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 COVID-19 crisis is over and then allow 6 months for public comment or other interactions. I ask that the comment period for this application be extended 6 months due to the continuing COVID-19 disruptions and that public DEIS meetings be held 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 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 released from Chernobyl and more plutonium than released in the Nagasaki bomb would move on our roads, rails, waterways through most states and Congressional districts for decades. Each shipment has the capability of destroying with radioactive contamination the regions through which they move due to accident or deliberate acts of terrorism or sabotage. Even with routine transport, containers would still emit radioactivity because compete shielding would make them too heavy to move. The DEIS does not but must fully consider more shipment miles, years and risks to move the waste again to a final site. This is an essential part of the overall purpose of an "interim" storage license.

Violates Environmental Justice

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

I support requests for providing all documents in Spanish.

Fails to Meaningfully Consider Alternatives, as required by law

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 the option of NOT proceeding with consolidated "interim" storage and providing safer nuclear waste management at or near the generation sites. The DEIS simply dismisses on-site and near-site storage options because they are not consolidated storage, without full analysis as required by NEPA. This is especially remiss in that consolidated storage is illegal under federal law.

Threatens Water

The DEIS fails to adequately assess the radioactive threats to water at and near the proposed site, including the nearby Ogallala Aquifer which spans 8 states, and in transport on and near water bodies across the country 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 could 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 when necessary, but this is absent in the application.

The inconsistent predicted lengths for the “interim" storage period range from several decades to a century or 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 they will encounter on 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 in any way 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. Michael Lombardi
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(215) 547-7096

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Comment Number: 687

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