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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

Document: NRC-2018-0052-DRAFT-0360

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General Comment

Dear NRC staff,

I am writing to submit a public comment in response to the Draft Environmental Impact Statement (Docket ID NRC-2018-0052) regarding Holtec International's application for a license to build and operate a "Consolidated Interim Storage Facility for Spent Nuclear Fuel and High Level Waste" (NUREG-2237).

I am strongly opposed to the Holtec storage proposal because:

1. New Mexico Does Not Consent

The motto of the Nuclear Regulatory Commission is "Protecting People and the Environment," yet the NRC's Draft Environmental Impact Statement (DEIS) on the Holtec project does neither. Instead, the NRC's inadequate draft EIS puts people, wildlife and precious water resources at significant and potentially, deadly risk by failing to heed the concerns of the community. We join the All Pueblo Council of Governors, New Mexico Governor Michelle Lujan Grisham, New Mexico State Land Commissioner Stephanie Garcia Richard, more than a dozen county and city governments, the Alliance for Environmental Strategies, the New Mexico Cattle

Growers Association, the Permian Basin Coalition of Land & Royalty Owners and Operators, the Nuclear Issues Study Group, and the more than 30,000 residents who commented during the 2018 scoping period in vehemently opposing bringing the nation's high level radioactive waste from nuclear power plants to our communities. We do not consent to becoming a nuclear wasteland for millions of years.

2. Cumulative Impacts

The DEIS is inadequate because it fails to consider cumulative impacts from the damage the nuclear industry has already inflicted on New Mexicans for the past 75 years: uranium mining and milling in the northwest on indigenous Din and Pueblo lands, including the 1979 Churchrock Disaster; radioactive contamination to Tewa lands and people from the Manhattan project in the Los Alamos area; fallout on downwinders from the Trinity Test in the Tularosa basin; the Waste Isolation Pilot Plant, which has already accidentally released dangerous amounts of radiation and now wants to expand; the URENCO uranium enrichment plant in Eunice; the world's largest nuclear warhead stockpile on the edge of Albuquerque; and the toxic threat to Albuquerque's aquifer by the Mixed Waste Landfill.

3. Threats to Water & Wildlife

The impact of this forever deadly nuclear waste would have devastating consequences on wildlife including threatened species that rely on the lagunas for drinking water and surrounding area as a critical habitat, including the Lesser Prairie Chicken, and the Dune Sagebrush Lizard. Agencies such as U.S. Fish & Wildlife, New Mexico Game & Fish, the Environmental Protection Agency (EPA) and New Mexico Environment Dept (NMED) have all gone on record attesting to the significance of Laguna Gatuna for migratory birds, and have argued that it should be designated permanently as a Water of the United States (WOTUS), which would make it eligible for protection under the Clean Water Act.

4. Threats from Transporting Irradiated Nuclear Fuel

Not only New Mexico would be adversely impacted by the Holtec project: all communities along the transportation routes between nuclear power plants and the Holtec proposed site would be threatened by radiation from the rail cars, and from the devastating financial and environmental damage if an accident or act of malice should occur. Studies have shown that one accident is likely to occur for every 10,000 shipments. It is irresponsible and dangerous for NRC to avoid inclusion of these mammoth risks and liability in its DEIS for Holtec's application.

5. Holtec's Project is Illegal

Finally, under current U.S. law, this project is illegal.

The Nuclear Waste Policy Act of 1982, as amended, does not allow the federal government to take title to the high level radioactive waste until a permanent geologic repository is operating. So the federal government cannot pay for transportation and storage of the waste as Holtec wants.

The license cannot be issued until either a permanent repository is operating, or U.S. law is changed.

For all the above reasons and more, I declare that the DEIS for Holtec's application is inadequate and further that the license for a high level radioactive waste storage facility should be denied . In conclusion, high level nuclear waste from nuclear power plants around the U.S. should not be brought to New Mexico-it should be isolated on or near the current site until there is an environmentally just and scientifically sound option is available.

Sincerely,

Fiona Macdonald