From: Florence Kelly <flokell@comcast.net>
Sent: Tuesday, June 16, 2020 11:24 AM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Comment against Holtec CIS Docket ID NRC-2018-0052

U.S. Nuclear Regulatory Commission (Holtec CIS)

RE: Comment against Holtec CIS Docket ID NRC-2018-0052

Dear ,

Comment to US NRC on proposed HOLTEC Consolidated "Interim" Storage Facility Docket ID NRC-2018-0052

Extend the Comment Period//Hold Public Meetings ALL along transport routes

Over 80 organizations asked NRC to 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 on the proposed Holtec nuclear waste site be extended 6 months due to the continuing COVID-19 disruptions. I ask that public DEIS meetings be held in communities along the potential transport routes in New Mexico and Texas and other corridor states, especially in large urban areas including but not limited to Atlanta, Chicago, Cleveland, Dallas/Fort Worth, Detroit, Nashville, Minneapolis/St Paul, New York/Newark, Omaha, Philadelphia, Pittsburgh, San Antonio, and Saint Louis.

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

The DEIS does not show all the potential routes through which waste would travel to get to the Holtec site in southeast New Mexico and dismisses the risks from transport even though it is essential to get waste there. The analyses done are inadequate for the substantial risks of these shipments through most states, over decades.

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 of the states and Congressional districts for DECADES one way. 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. Absent those threats, containers still emit radioactivity because compete shielding would make the containers too heavy to move. Add more shipment miles, years and risks to move it to a final site, not considered in the DEIS.

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 (more than 90% of the radioactivity in nuclear power and weapons waste) generated in the US to and through communities of color. The trunk rail lines that will deliver most of the high level radioactive waste to Holtec are routed through older neighborhoods and core

areas of American cities. Routine radioactive "shine," accidents or deliberate attacks would disproportionately impact poorer, minority communities. The Holtec/Eddy Lea area is largely Hispanic and has numerous other industrial facilities in the area with radioactive and other chemical emissions exacerbating the impacts.

I support requests for providing all documents in Spanish.

Failure to Assess the Full Environmental Impacts if the Site lasts longer than 40 years or becomes permanent
Analyzing the application for a 40 year license ignores the possibility of the waste staying there for much longer or indefinitely. 40 years is inappropriately, arbitrarily short, given Holtec's own admission in its application that "interim storage" could persist for 120 years and a statement by Holtec staff that it could be 300 years.

Failure to Meaningfully Consider Alternatives, as required by law

Rather than consider alternatives to moving waste across the country to a consolidated location, NRC only considered other consolidated locations. NRC did not analyze the option of NOT proceeding with consolidated storage and providing safer nuclear waste management at or near the generation sites, dismissing on and near-site storage options because they are not consolidated storage. This is especially remiss in that the consolidated storage is illegal under federal law.

Failure to protect Water

The DEIS fails to adequately assess the radioactive threats to water at and near the proposed site and in transport on and near water bodies across the country including the Great Lakes, Chesapeake Bay, rivers and oceans.

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 high level waste fuel stays dangerous. There is no plan at the Holtec NM site for recontainerizing damaged and worn out containers, even though the site could de facto become permanent. In absence of fuel pools, NRC must require dry transfer facilities so the irradiated fuel can be remotely moved to new, better containers when necessary.

The inconsistent predicted lengths for “interim storage” period, from several decades, to a century, or centuries, or even de facto permanently (forevermore), timeframes could dangerously exceed the design and service life of the containers.

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

I do not believe any emergency circumstances exist which justify NRC gutting or bypassing NEPA, 42 U.S.C. § 4321 et seq. I oppose any NRC attempt to curtail or limit in any way a thorough, deliberative inquiry under NEPA into all environmental impacts likely to be caused by licensing, construction and operation of the Holtec Consolidated "Interim" Storage facility.

Sincerely,

Sincerely,
Ms. Florence Kelly
139 Ellsworth St.
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(415) 826-7294

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Comment Number: 405

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