

**From:** Kevin Kamps <kevin@beyondnuclear.org>  
**Sent:** Saturday, June 27, 2020 10:47 PM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Beyond Nuclear public comments #10, re: NRC's Holtec/ELEA CISF DEIS,

Dear NRC Staff,

NRC's collusion and complicity in rubber-stamping license application approvals for CISFs -- both Holtec/ELEA's in NM, as well as ISP/WCS's in TX -- is objectionable. The U.S. Nuclear Regulatory Commission is supposed to protect public health, safety, security, and the environment. As the country's nuclear safety regulatory agency, NRC is not a policy setting agency, and is not supposed to promote nuclear power industry schemes, such as these CISFs.

Yet, at its late 2015 [Division of Spent Fuel Management RegCon](#) (Regulatory Conference), NRC's Tony Hsia, Acting Director of the Division of Spent Fuel Management, in his closing remarks, concluded the two-day symposium with no less than a pep rally cry. He passionately called for industry and NRC (as well as DOE, and other nuclear establishment players) to work together ("[If we] all work together, we can make it [centralized interim storage] happen!"), to open de facto permanent, surface storage, parking lot dumps, such as at Interim Storage Partners/Waste Control Specialists, LLC in Andrews County, TX, and/or Holtec International/Eddy-Lea Energy Alliance, near WIPP in NM. He even pumped his fist in the air when he did so. Such advocacy in favor of the proposed CISFs, by a senior NRC manager, was incredibly inappropriate.

Such schizophrenic safety regulation/industry promotion imbalance is what led to the demise of the U.S. Atomic Energy Commission by the mid-1970s. Stringent safety regulation and unbridled industry advocacy are mutual exclusive, of course. NRC rose from AEC's ashes with the clear mandate to "protect people and the environment," as the NRC logo puts it. DOE was given the nuclear advocacy role, embodied in its unbridled Office of Nuclear Energy (ONE). NRC has violated its mandate. It has strayed very far into the policy setting and industry advocacy arena.

NRC Staff, as well as the Atomic Safety and Licensing Board Panel, and even the NRC Commissioners, have done so ever since Tony Hsia's incredibly inappropriate pep rally cheer in favor of CISF licensing in late 2015. NRC's complicity and collusion with Holtec/ELEA and ISP/WCS is not only immoral and illegal, it is very dangerous.

The Japanese Parliament concluded that the root cause of the Fukushima Daiichi nuclear catastrophe was collusion between regulator, industry, and government officials. It was the reason the three reactors, that melted down and exploded, were so very vulnerable to the earthquake and tsunami that struck them on 3/11/11 in the first place. Such dangerous collusion exists in spades in the U.S., as on radioactive waste, as between NRC (Staff, Licensing Board Panel, and Commissioners) and Holtec/ELEA, re: the proposed CISF in NM.

These comments are submitted on behalf of our members and supporters in NM and TX, and across the U.S. along impacted Mobile Chernobyl transport routes.

Please acknowledge receipt of these comments. Thank you.

Sincerely,

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Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abolish both to safeguard our future. Beyond Nuclear advocates for an energy future that is sustainable, benign and democratic.

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