

**From:** Basia Miller <basia.miller5@gmail.com>  
**Sent:** Monday, June 29, 2020 5:53 PM  
**To:** Holtec-CISFEIS Resource; +protectnewmexico@gmail.com  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052 Draft Environmental Impact Statement Comment

Re: Docket ID NRC-2018-0052 Draft Environmental Impact Statement 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. Neither the No-Action Alternative nor the Hardened Onsite Storage (HOS) was considered in the DEIS. By itself, this shortcoming vitiates the Holtec application.

2. No evaluation was made in the DEIS of the country's rail system, upon which depend the shipments of spent nuclear fuel over the course of 20 years, and which already earns a low grade for safety. By itself, this shortcoming vitiates the Holtec application.

3. No provision is proposed for financial settlements necessary in case of accident, leaving costs to be borne by local communities. By itself, this shortcoming vitiates the Holtec application.

4. 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.

5. 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 Diné 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. Rather than adding 173,600 metric tons of high level radioactive waste to a state that has already been grossly overburdened, the United States should be directing its resources towards cleaning up the contamination already present in our communities, just compensation, and holistic community health studies. The DEIS also fails to account for cumulative impacts from the other proposal for Consolidated Interim Storage, approximately forty miles east at the current Waste Control Specialists low-level radioactive waste site.

6. I end with the fact that consideration of the Holtec license is illegal, given the stipulation by NEPA that a permanent repository must exist prior to licensing.

7. Finally, a heartfelt request. Questions of this nature—with a time-line of a million years and concerning 10,000 shipments—are inappropriate to discuss on telephone and computer networks. The comment evening ran 5 1/2 hours because it was so difficult for people to speak. Where is the expertise on technology who could smoothly facilitate an evening of comments? We need to wait until a vaccine is found, and then hold public meetings where people can speak face to face in the following six-month period.

I do not see the NRC being responsive to the need to adjust the comment period during the world pandemic.

In these and in many other ways, I find the DEIS an inadequate statement of the situation on the ground as described by the NRC. I know I am supported by James Kelley, Secretary of the Environment in New Mexico.

Sincerely,

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