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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-0371

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Submitter Information

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General Comment

We are strongly opposed to the Holtec storage proposal because the site is located near or on two lagunas or playa lakes: Laguna Gatuna and Laguna Plata. Lagune Plata is an archaeological district that has been extensively studied for decades. Two sites near Laguna Gatuna, where thenuclear waste is proposed to be stored, are listed on the National Register of HistoricPlaces. Archaeologists have found a plethora of evidence of the Jornada Mogollonpeople, dating from 200 AD, 700 AD, and 1200 AD. More than 200 archeological sitesare located within six miles of the proposed nuclear waste dump. Laguna Gatuna, whileoften dry, fills with water after monsoon rains, attracting a variety of wildlife and huntersfor millenia. The Hopi and Mescalero Apache nations have identified the area asculturally significant to them, and the Hopi nation has informed the NRC that traditionalcultural properties could be adversely affected if this project proceeds. The site whereHoltec wants to dump tens of thousands of tons of radioactive waste has profoundhistoric value and significance.5. Threats to Water & WildlifeThe impact of this forever deadly nuclear waste would have devastating consequenceson wildlife including threatened species that rely on the lagunas for drinking waterand surrounding area as a critical habitat, including the Lesser Prairie Chicken, and theDune 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 Waterof the United States (WOTUS), which would make it eligible for protection under theClean Water Act.6. Threats from Transporting Irradiated Nuclear FuelNot only New Mexico would be adversely impacted by the Holtec project: allcommunities along the transportation routes between nuclear power plants andthe Holtec proposed site would be threatened by radiation from the rail cars, andfrom the devastating financial and environmental damage if an accident or act of maliceshould occur. Studies have shown that one accident is likely to occur for every 10,000shipments. It is irresponsible and dangerous for NRC to avoid inclusion of

these mammoth risks and liability in its DEIS for Holtec's application. 7. 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 available. Sincerely, Ken and Ethel Kipen Ashfield MA USA