

From: Linda Seeley <lindaseeley@gmail.com>
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To: Holtec-CISFEIS Resource
Subject: [External_Sender] CISF DEIS

In your Draft EIS, you have not taken into account that the inner canisters will have to be transferred:

*from on-site storage dry casks to radiation shielding/transfer casks;

*to transport/shipping casks, to transfer casks, to CISF storage pits.

* And then, if and when high-level radioactive wastes are exported to a permanent repository, the reverse process will have to be performed multiple times.

Yet, the NRC is not requiring Dry Transfer Systems (DTS), so there will be no way to deal with failed fuel or containers, as well as leaks or contamination.

Expert witness, Bob Alvarez, a former senior advisor to the U.S. Energy Secretary, has testified in these CISF proceedings that under DOE's latest Yucca Mountain Repository plans, high-level radioactive wastes can only be buried in TADs -- standardized Transport, Aging, and Disposal containers specially designed for use at the Yucca dump. This would require dividing up the contents of 10,000 containers at Holtec into 80,000 smaller TADs. Nowhere is this addressed in the Holtec EIR, nor the NRC DEIS.

Both Holtec and NRC assume Yucca Mountain will be the ultimate destination for the high level waste. But that repackaging process carries significant risks and potential impacts for health, environment, and safety.

The entire complex, high- risk subject matter area is missing from NRC's Holtec CISF DEIS, another violation of NEPA's "hard look" requirement, and even a violation of the Atomic Energy Act, given the inherent, large safety risks.

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