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Sent: Sunday, July 19, 2020 9:13 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Docket ID NRC-2018-0052
Attachments: Holtec HLRW Comments 07082020.pdf; ATT00001.txt

Dear Sirs: I write as Chair of the San Antonio Sierra Club in urging you to adopt the NO ACTION alternative, the only one keeping the risks where they belong, with the past beneficiaries, UNTIL PERMANENT storage is ready. "Interim" storage is politically motivated to dump this on a "remote" location. It would result in great profit to a few, great hazard to millions, huge unnecessary taxpayer expense, and terrible injustice to all the people along transport routes and living close to this site. Proponents are thinking about profit only, not about safety.

Federal Register Notice: 85FR16150
Comment Number: 2167

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Holtec HLRW Comments 07082020

Holtec-CISFEIS@nrc.gov

Docket ID NRC-2018-0052

Dear Sirs:

I write as Chair of the Alamo Group (San Antonio), Lone Star Chapter (Texas), Sierra Club. I represent the almost 3000 members of our group in urging you to **reject** the Holtec International HI-STORE Consolidated Interim Storage Facility (CISF) Project.

I lived in Midland, TX for many years during the entire evolution of WCS from a standard hazardous waste site, through its approval (after 3 legislative tries) as a Low Level Radioactive Waste (LLRW) site. Holtec, like WCS, now aspires to receive High Level Radioactive Waste (HLRW) in Spent Nuclear Fuel (SNF). I have toured WCS, Urenco and WIPP. I still have friends and colleagues living in Hobbs, Eunice, Andrews, Odessa and Midland. This “Nuclear Alley” is home to thousands of people whose lives are being placed at great risk for the profits of a few.

The Nuclear Waste Policy Act of 1982, as amended, **does not allow** our federal government to take title to the nation’s high-level radioactive waste until a **permanent**, not interim, **geologic repository is operating**. The law says nothing about “interim storage” and until changed these efforts to unload on taxpayers the waste currently stored on site at nuclear power plants will not withstand legal challenge. The fact that the federal government has been unable to develop a permanent geologic repository site is bad but does NOT justify the huge expenses of developing “interim” storage, especially as there is ZERO assurance that once placed in “interim” storage this HLRW will EVER be moved again to a safe, permanent, geologic site.

Transportation impacts are labeled “small” and address only local traffic near the site. This is absurd. Transport of thousands of shipments of HLRW over our roadways and railways for decades **cannot** be safer than the current situation of storage on site. These shipments will pass through and near most of the large population centers in the U.S., **including San Antonio**, to which **WE DO NOT CONSENT**. Emergency response capabilities are stretched to the limit in many of our cities. Rural responders are often volunteers with limited training and equipment but may be called to deal with a major nuclear disaster from just one leaking, or even stolen or attacked transport cask. It is absurd the DEIS plans for only 10 hours of delay in maximum response time given many of the difficult to access locations at risk. It is absurd the DEIS anticipates no exposure beyond 800 meters, given our strong Texas winds. Our city along with many others passed a resolution in 2017 opposing these plans because of these safety concerns. This is also a serious equity issue as many of these rail lines and highways are bordered closely by poor communities of color. Many such communities are Spanish speaking and may not even be aware of this proposal, especially in these times of Covid. To label environmental justice impacts as “small” is offensive.

Government predictions show at least one such serious accident occurring among 10,000 canisters. One such accident could release Fukushima equivalents of radiation, anywhere along these many shipment routes. The risk and expense of such transport should be taken ONLY ONCE, when a PERMANENT storage site is chosen and developed. “Interim” storage has a very high likelihood of becoming de facto permanent storage. “Out of sight, out of mind” will take hold, and Congressional interest in providing adequate funding to find and develop a truly safe “Permanent” repository (to the extent anything requiring thousands of years of safety profile can be called such) will disappear.

Holtec HLRW Comments 07082020

I urge you to choose the NO ACTION alternative which maintains current risks where past benefits of electricity generation occurred, the fair solution. NO ACTION now means one period of mass shipments only, WHEN PERMANENT REPOSITORY CONDITIONS EXIST.

Thank you,

Terry Burns, M.D., Chair, Alamo Group, Sierra Club, tbscpbpsc@satx.rr.com

Thank you for your consideration,

Terry Burns, M.D.
Chair, Alamo Group, Lone Star Chapter, Sierra Club
P.O. Box 6443
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