

From: Ed Davis (edavis@pegasusgroup.us) <edavis@pegasusgroup.us>
Sent: Wednesday, July 22, 2020 3:11 PM
To: Holtec-CISFEIS Resource
Cc: Caleb Ward (chsward@gmail.com); Ed Davis (edavis@pegasusgroup.us)
Subject: [External_Sender] RE: Holtec-CISFEIS NIC Comment Letter on the NRC Draft GEIS on the New Mexico Consolidated Storage Facility
Attachments: 200722.NIC Comment Letter to NRC on the Draft EIS for the New Mexico Consolidated Interim Storage Facility (CISF).pdf

All:

Please find attached the comments by the U.S. Nuclear Industry Council (NIC) submitted on behalf of its over 75 members on the NRC draft Generic Environmental Impact Statement (GEIS) on the proposed Holtec Consolidated Interim Storage Facility located in New Mexico.

Please include the attached comments in the record of the proceedings.

NIC recommends and supports the proposed action as recommended by the NRC staff in the GEIS.

Please contact me if you have any questions.

Edward M. Davis
Pegasus Group
202-262-6236
edavis@pegasusgroup.us

Federal Register Notice: 85FR16150
Comment Number: 2178

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United States Nuclear Industry Council
1317 F Street NW Washington, DC 20004

July 20, 2020

U.S. Nuclear Regulatory Commission Office of Administration
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ATTN: Program Management, Announcements and Editing Staff

Subject: Docket ID NRC-2018-0052
U.S. NIC Comments on NUREG-2237, Environmental Impact Statement for the
Holtec International's License Application for a Consolidated Interim Storage
Facility for Spent Nuclear Fuel and High Level Waste

Dear Sir or Madam:

On behalf of the over 75 companies that comprise the membership of U.S. Nuclear Industry Council (NIC), we are pleased to provide comments on the Nuclear Regulatory Commission's (NRC's) draft environmental impact statement (DEIS) for the proposed Holtec Consolidated Interim Storage Facility (CISF) in southeast New Mexico.

Holtec has applied for a license to construct and operate a CISF in New Mexico that would allow for the consolidation and storage of used nuclear fuel (UNF) in a centralized location rather than stored at numerous locations around the country. As proposed, the operation of the CISF would greatly enhance the management of UNF and allow shutdown reactor sites around the country to be fully decommissioned and repurposed for other uses. In addition, the CISF when placed into operation will provide enhanced flexibility in UNF management for operating nuclear plants.

Moreover, the U.S. NIC firmly believes that the CISF would not obviate the need for a permanent repository for disposal of UNF and high-level radioactive waste and that the NRC licensing process of the Yucca Mountain repository should be expeditiously completed.

As the lead Federal agency responsible for environmental review under NEPA for commercial nuclear facilities, the NRC evaluated the environmental impacts of the proposed CISF for the storage of UNF and Greater-Than-Class C waste. The results of the NRC review and evaluation are documented in draft NUREG-2237. The NRC draft EIS includes the NRC staff's evaluation of the environmental impacts of the proposed action related to NRC issuing a license for the facility and authorizing the initial phase of the project to store up to 8,680 metric tons of UNF in 500 canisters for a license period of 40 years.

U.S. NIC offers the following comments on the draft EIS:

General

U.S. NIC finds that the draft EIS prepared by the NRC represents a thorough and comprehensive review of the environmental impacts associated with the proposed action of authorizing the construction, operation, and decommissioning of the Holtec CISF in New Mexico at the proposed site that was evaluated by the NRC staff.

The NRC staff found that the environmental impacts of the proposed action were determined to be “**Small**” for the majority of the resource areas evaluated by the NRC, including Land Use, Operations, Transportation, and Decommissioning and Reclamation, while Socioeconomic impacts would be “Small” for population, employment, housing, and public services and “**Moderate**” and beneficial for local finance.

U.S. NIC agrees with the preliminary NRC staff recommendation for “issuance of a license to Holtec authorizing the initial phase of the project, unless safety issues mandate otherwise” (Abstract, p. iii). In addition, U.S. NIC concurs that the draft EIS supports the Bureau of Land Management (BLM) issuance of the proposed rail spur that supports the transfer of SNF to and from the main line to the proposed CISF.

Specific Comments:

Safety of Used Fuel Storage

The NRC found that CISF impacts to public and occupational health would be “SMALL.” USNIC agrees with this finding, and that the finding is supported by the fact that used nuclear fuel has been stored safely in the United States and abroad since the 1950s.

Safety of Used Fuel Transportation

The NRC found that the impacts of transportation of used fuel to the proposed CISF in New Mexico and, eventually, from the CISF to a repository for permanent disposal would be “SMALL.” USNIC agrees with this finding, and that the finding is supported by the fact that used nuclear fuel has been transported safely in the United States and abroad since the 1950s¹. Over 4,000 shipments of used nuclear fuel have been made safely over the U.S. highways and rail roads since 1964.^{1,2} In addition, the U.S. Department of Energy has transported to the Waste Isolation Pilot Project in New Mexico nearly 12,000 shipments of transuranic since 1999 without incident³.

Benefits of a CISF

Given the current stalemate over the permanent disposal of used nuclear fuel, development of CISFs such as the proposed Holtec facility would enhance the management of SNF in the United States. The operation of the proposed CISF would provide a safe and effective storage capability for unused spent nuclear fuel from numerous nuclear plants that have been decommissioned, except for plant-specific ISFSIs. Consolidated storage of this unused spent nuclear fuel would facilitate the management of this material pending the licensing and operation of a repository for permanent disposal.

Respectfully,

A handwritten signature in black ink, appearing to read 'Bud Albright', with a stylized flourish at the end.

Bud Albright
President & CEO
U.S. Nuclear Industry Council &
U.S. Under Secretary of Energy (2006-2008)

References:

1. American Nuclear Society (ANS), Position Statement #18
2. Connolly, K.J. and R.B. Pope, "A Historical Review of the Safe Transport of Spent Nuclear Fuel", Oak Ridge National Laboratory, ORNL/SR-2016/261 Rev. 1., 2016.
3. U.S. Department of Energy, Waste Isolation Pilot Plant, "Shipment and Disposal Information: Shipments Received As of May 15, 2017," available at www.wipp.energy