From: E R Clarke <info@sg.actionnetwork.org>
Sent: Wednesday, July 29, 2020 4:33 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Halt the license for radioactive waste storage

office of administration,

Office of Administration
Mail Stop: TWFN-7-A60M
Attn: Program Management, Announcements and Editing Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Draft Environmental Impact Statement (DEIS), Docket No. 72-1050; NRC-2016-0231 Interim Storage Project's license application to construct and operate a Consolidated Interim Storage Facility (CISF) for spent nuclear fuel (SNF) and Greater-Than Class C (GTCC) waste.

Dear NRC Commissioners and Staff,
Interim Storage Project's application would lead to the import and storage of 40,000 tons of spent nuclear fuel from nuclear reactors around the country in Andrews County, Texas, for 40 years, or perhaps forever. This environmentally unjust plan and would target a largely Latinx region of the country with the deadliest nuclear waste. The region is unsuitable for storing nuclear waste since it's prone to earthquakes, sinkholes, temperature extremes, wildfires, intense storms and flooding.

Nationwide, this plan would jeopardize the health and safety of millions of people unnecessarily due to risks from potential leaks, sabotage or transportation accidents. Consolidated interim storage is an illegal band-aid approach to radioactive waste problems that fails to get the waste into permanent disposal for long-term isolation.

The NRC has ignored many key health and safety issues raised in thousands of previous comments and in 100 legal contentions, many of which were backed by expert testimony. The inadequate Draft Environmental Impact Statement (DEIS) shows that

the NRC is still not addressing these concerns.

No hot cell is proposed, which should be mandatory for this type of facility. There would be no way to repackage radioactive waste from a cracked or leaking canister, and no way to move it anywhere as a result.

Threats from terrorism aren't adequately addressed and the potential use of drones wasn't considered. There is no discussion of whether the waste could go critical and under what conditions this could occur. Hardened Onsite Storage Systems (HOSS) was not considered as an alternative to Consolidated Interim Storage, a glaring omission.

Transportation routes were not designated and accident risks have been artificially minimized. State of Nevada Yucca Mountain studies found that a single small accident could permanently contaminate 42 square miles of land. Radioactive Waste Management Associates' found that 1370 latent cancer fatalities could result from a rail accident with spent nuclear fuel, with costs of $145 - $270 billion for a severe accident. The DEIS ignores available scientific data and wrongly minimizes these risks.

The DEIS fails to adequately analyze cumulative impacts of the proposed facility and nearby sites on workers, local people and the environment. Natural disasters or an accident could create cumulative impacts. A fire and a subsequent radiation release at the nearby WIPP site cost $2 billion to remediate, but this was never mentioned. The DEIS fails to analyze impacts of potential groundwater could have on viability of the storage pad, which must be able to support extremely heavy casks and canisters.

The risks of creating a dangerous de facto permanent site interim were not included, although Former NRC Chairman Gregory Jaczko has said that a consolidated interim storage facility should be viewed as a permanent facility. Nuclear waste should not be moved across the country to a site not designed for permanent disposal.

This nation must end environmental injustice and halt disproportionate impacts on people of color. Dumping the most toxic nuclear waste of a whole nation on the largely Latinx Southwest region is the height of environmental injustice.

It's time to protect the land, air and water, wildlife, plant life and aquifers of this region

and transport regions along the way. Businesses at risk include pecan growers, the ranching and dairy industries and the oil and gas industry.

I oppose Consolidated Interim Storage at this, and other sites. The DEIS fails to adequately analyze environmental and cumulative impacts and the socioeconomic risks of the proposed radioactive waste storage application. The NRC should protect public health and safety, the economy and the environment, by halting the application process and denying the license for Consolidated Interim Storage.

Thank you,

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