

**From:** Donna Knipp <knipp.donna@gmail.com>  
**Sent:** Thursday, August 13, 2020 5:19 PM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052: Extend comment period

***Re: Docket ID NRC-2018-0052***

***NRC's time-limited focus on just 40 years of "temporary storage" is inappropriately, arbitrarily short, given Holtec's own admission in its license application to NRC that "interim storage" could persist for 120 years; in response to a Request for Information from DOE, Holtec admitted a CISF could operate for 300 years; and in NRC's own 2014 Continued Storage of Spent Nuclear Fuel Rule and Generic EIS, the agency acknowledged away-from-reactor ISFSIs (Independent Spent Fuel Storage Installations) could go on indefinitely. Institutional control could be lost over such long time periods. Failed containers could release catastrophic amounts of hazardous radioactivity directly into the surface environment, to blow downwind, flow downstream, bioconcentrate up the food chain, and harm people down the generations.***

***Sincerely,***

***Donna Knipp  
Manhattan***

**Federal Register Notice:** 85FR16150  
**Comment Number:** 2196

**Mail Envelope Properties** (CAKarcokqoJ26c1YMSvmFtQz5ipN1y53v\_52Na9upmf5zjb45pA)

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