From: Madeline Helbraun <mhelbraun@bodyawarement.com>
Sent: Friday, August 14, 2020 9:25 AM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Comment to US Nuclear Regulatory Commission on DEIS for WCS ISP CISF

U.S. Nuclear Regulatory Commission (WCS CISF)

RE: Comment to US Nuclear Regulatory Commission on DEIS for WCS ISP CISF

Dear ,

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

RE: COMMENT on WCS/ISP DEIS Docket No. 72-1050; NRC-2016-0231 Interim Storage Partner's license application to construct and operate a Consolidated 'Interim' Storage Facility (CISF)

To: Nuclear Regulatory Commission

The ISP Draft Environmental Impact Statement (DEIS) is Misleading, Incomplete and Denies or Ignores Reality. It:

--Fails to assess the additional risk to the country that one or more CIS sites will cause. Not all waste will be moved from all nuclear power reactors sites to ISP/WCS (or to the Holtec site proposed nearby) thus the CIS sites are ADDITIONAL sites requiring massive transport risks, with no guarantee that the sites sending the waste will really be cleaned up.

--Incorrectly assumes only 40 years of storage even though the waste could be at the site far longer than that, potentially indefinitely. The DEIS incorrectly assumes there will be a permanent repository elsewhere, despite the only proposed permanent repository at Yucca Mountain having been rightly cancelled in 2010. The ISP/WCS application does not provide protections for long term or permanent isolation and the DEIS ignores this. The more-likely reality—i.e., that the waste will be at the site for much longer than the 40-year license period—is not addressed in the DEIS. This puts the air, water, soil and ecosystem at long term risk from radioactivity.

--Incorrectly assumes all waste and containers that arrive will be intact and waste will not need to be re-containerized for the decades it will remain at the WCS ISP site. The DEIS fails to address what happens when waste must be repackaged. The application and the DEIS should require a wet or dry transfer facility to shield the intensely radioactivity so it can be repaired or transferred to new containers.

Workers, passers-by and the environs could receive massive, potentially lethal, gamma doses in that scenario--yet no assessment is provided in the DEIS.

--Fails to address the environmental impacts of returning damaged containers of high-level radioactive waste if they arrive in unacceptable condition. ISP's plan is to "return to sender" with no analysis of the logically higher risk of transporting failed fuel and/or containers twice.

--Ignores potential higher risks from damaged fuel and high burnup fuel.

--Fails to acknowledge or respect the institutional racism in selecting the ISP WCS site in West Texas.

-- Fails to acknowledge impacts on all transport routes to the site. I call on NRC to hold in-person DEIS meetings all along the potential routes and to extend the comment period until six months after the COVID-19 crisis ends.

Sincerely,
Ms. Madeline Helbraun
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Falls Church, VA 22042
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