From: Rob Doucette <robdoucette1@gmail.com>
Sent: Friday, August 14, 2020 2:15 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Comments + Extension Request Docket NRC-2018-0052 Holtec CISF DEIS

U.S. Nuclear Regulatory Commission (Holtec CIS)

RE: Comments + Extension Request Docket NRC-2018-0052 Holtec CISF DEIS

Dear ,

The Holtec proposed nuclear waste site in New Mexico would be the largest high-level commercial radioactive waste site in the world! It would trigger decades of dangerous nuclear waste transport on US roads, rails, and waterways regularly through big cities, small towns, farmlands, over rivers, lakes, bays, and oceans. The American public deserves in-person public meetings on Consolidated "Interim" Storage (CIS) and the unprecedented, inevitable massive transportation program that would take DECADES, about which the public also deserves more time to learn and comment. I hereby submit the following requests and comments:

1) Extend the comment period on the Holtec Draft Environmental Impact Statement Docket NRC-2018-0052 until 6 months after the COVID-19 public health crisis is over.

82 organizations asked NRC to suspend ALL licensing and rulemaking throughout the Commission until 6 months after the END of the COVID-19 crisis. Please honor this request for the Holtec CIS application.

The US House and Senate in April 2020 called for ALL rulemakings and proceedings involving public input to be suspended until 45 days AFTER the END of the COVID-19 public health crisis.

The pandemic continues, and is worsening, amid the consequent economic crisis, with over 34 million people out of work and drastic reductions in federal supplemental unemployment insurance! There is no need to rush this application process by sacrificing democracy.

2) Hold the 5 promised public meetings in New Mexico IN PERSON, WHEN IT IS SAFE to do so, and extend the comment deadline until 6 months after the end of the COVID-19 crisis. 3) Hold public meetings along all transport routes IN PERSON, WHEN IT IS SAFE to do so.

4) I join New Mexicans and people across the US in rejecting the NRC's four recently scheduled conference calls, crammed into a 2 week period, to replace the promised five public meetings in New Mexcico and additional meetings that are necessary across the country.

NRC committed to New Mexicans including the state’s Congressional delegation that the agency would hold five in-person public meetings throughout the state (when safe for in-person meetings) on the Draft Environmental Impact Statement for the proposed Holtec nuclear waste dump. But now NRC has announced it will hold four national conference calls, in less than a two-week period.

Holding online meetings does not substitute for in-person meetings in and near affected communities, but the NRC's recent performance with such forums has been a gross failure. NRC's use of teleconferences has resulted in people waiting OVER FIVE HOURS to speak, and some NEVER ALLOWED to SPEAK, multiple technical problems and delays, the failure of NRC to un-mute speakers, NRC enforcing stricter time limits for critics than for proponents of the project, and the inability to hear and see the presentations.

This is a violation of economic and environmental justice principles, since lower income people have less access to smart phones, computers, broadband internet access, and technical support, thus excluding people from the process.

5) Reject the illegal Holtec application. NRC should not even be processing the application because it is illegal to license a supposedly "interim" consolidated storage site dependent on federal funding and ownership of commercial high-level radioactive waste, when there is no final repository in operation.

6) The application illegally assumes the cancelled Yucca Mountain proposed repository will operate! This is a major flaw in the application.

7) DON'T rush review of the Holtec license application and the draft environmental impact station under the cover and distraction of the COVID-19 crisis!

Sincerely,
Mr. Rob Doucette
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Federal Register Notice: 85FR16150
Comment Number: 3103

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