

From: Judy Lukasiwicz <jsteel@cruzio.com>
Sent: Friday, August 14, 2020 9:05 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 hazardous, high-level commercial radioactive waste site in the world. It would trigger decades of dangerous radioactive nuclear waste transport on US roads, rails, and waterways. This ill-thought-out proposal would regularly transport hazardous waste through big cities, small towns, farmlands, over rivers, lakes, bays, and oceans. The US public requires and deserves in-person public meetings on Consolidated "Interim" Storage (CIS) and the unprecedented, inevitable massive and hazardous transportation program that would cover DECADES. The United States public also requires adequate time to learn about this proposal and to comment.

I 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 to assure safety.

*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. In addition, the US House and Senate (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. Unfortunately, the pandemic continues, and is worsening, with the addition of the consequent economic crisis. --There is absolutely no need to rush this application process by sacrificing democracy in the USA.

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 Mexico, and the 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 recently, the NRC has announced it will hold four national conference calls, in less than a two-week period. This is inadequate and unacceptable.

*Holding online meetings cannot substitute for in-person meetings in and near affected communities. The NRC's recent performance with such forums has been a failure for all involved. Some of the outcomes of NRC's use of teleconferences has resulted in people waiting OVER FIVE HOURS to speak, and some citizens 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 many lower income people have no access to smart phones, computers, broadband internet access, and technical support, thus excluding many impacted citizens 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 public 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 (2010) Yucca Mountain proposed repository will operate, though it was and remains unsound and unsafe for radioactive waste containment. This is an obvious and fatal flaw in the application.

7) DO NOT rush the review process of the Holtec license application and the draft environmental impact statement under the cover and distraction of the current COVID-19 crisis. The global crisis impacting the USA requires continued widespread, and stronger, environmental protections from any further harm to our public.

Thank you for reconsidering the hasty move toward any new legislation that would cause harm to US citizens. Also, thank you for considering and dropping the unfeasible and unsafe proposal for radioactive nuclear waste transport and storage at the proposed Holtec site.

Sincerely,
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