

From: Joni Arends <jarends@nuclearactive.org>
Sent: Tuesday, August 18, 2020 11:50 PM
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/WCS Draft Environmental Impact Statement (DEIS) is misleading, technically 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 be cleaned up now or in the future.

--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 by the federal government in 2010. The ISP/WCS application omits the protections needed for long term or permanent isolation of the dangerous long-lived wastes. 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 at the 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 or damaged 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. A "return to sender" plan is not plan.

Witness the current storage of transuranic waste at the ISP/WCS site. That waste is from the same waste stream as the defectively packaged transuranic waste at Los Alamos National Laboratory that exploded at the Waste Isolation Pilot Plant in 2014. WCS/ISP do not have repackaging facilities so that the waste could be shipped to LANL and/or WIPP. "Return to sender" is not a viable plan to address unacceptable waste and/or damaged waste containers.

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

--Fails to acknowledge or respect the systematic institutional racism implemented to select the ISP WCS site for high-level radioactive waste in West Texas.

-- Fails to acknowledge impacts for all transport routes to the site, including the lack of emergency preparedness and response.

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

Sincerely,
Ms. Joni Arends
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