From: Patrick Bosold <bosolds@lisco.com>
Sent: Tuesday, August 25, 2020 9:17 PM
To: Holtec-CISFEIS Resource
Cc: 'Patrick Bosold'
Subject: [External_Sender] Citizen comment on Docket ID NRC-2018-0052, Holtec irradiated nuclear fuel Consolidated Interim Storage Facility (CISF) Draft Environmental Impact Statement (DEIS)

Dear Nuclear Regulatory Commission team,

This is a citizen comment on Docket ID NRC-2018-0052, Holtec irradiated nuclear fuel Consolidated Interim Storage Facility (CISF) Draft Environmental Impact Statement (DEIS).

Nuclear Regulatory Commission rules require that the Environmental Impact Statement examine transportation issues. Iowa will be a major transportation route for moving the spent fuel rods from power plants to the interim storage site in New Mexico. I am an Iowa resident and I live about ½ mile away from one of the major rail lines (BNSF) that runs through the state and that will likely be used for rail transport of spent fuel rods from nuclear power plants.

Iowa railroads are expected to be used to transport the spent fuel rods from nuclear power plants from the north-eastern United States, as well as the upper Midwest (Minnesota, Michigan, and Illinois), and also from the Duane Arnold nuclear power plant in Palo, Iowa. The spent fuel will be shipped via a unit train which is a train that is supposed to be shipping no other items. The train is supposed to consist of several engines and one or two rail cars, each holding one canister of spent fuel rods.

Additionally Iowa's roads are expected to be used to transport the spent fuel rods, primarily Interstate 80 and Interstate 35, as well as roads in Linn County, Iowa, from the Duane Arnold Energy Center in Palo, Iowa. I travel along both of these federal superhighways from time to time.

Because the Duane Arnold plant is in Iowa, it is expected that the fuel canisters will be loaded onto rail cars in Iowa. That means that there will be a truck-to-rail transfer area with specialized equipment to handle the fuel canisters somewhere in Linn County, Iowa.

Several other nuclear power plants reside close to Iowa's borders - Quad-Cities Generating Station in Cordova, Illinois; Cooper Nuclear Station in Brownville, Nebraska; and Fort Calhoun Nuclear Generating Station in Omaha, Nebraska, which ceased operation in 2016. It is not clear, at this point, if any of the spent fuel from these nuclear power plants will be transported on highways within Iowa.

Throughout the 40-year license period one to two shipments of spent fuel rods will arrive in New Mexico every day. Not all of those shipments will travel through Iowa. However, it is conceivable that Iowa will see a significant number of shipments.

I ask that the following points be considered by the NRC as they prepare their Environmental Impact Statement:

- The EIS should review the safety of the current rail lines in Iowa that are expected to be used in moving the fuel canisters, including what would be required to harden the route to ensure that it can safely handle the weight of the unit train.

- The effects of climate change on the integrity of the rail bed, highways and both rail and highway bridges needs to be evaluated. The effects of climate change have affected Iowa's weather in significant ways and will continue to have major effects in the foreseeable future. Every major river across the state has experienced 100-year floods in the last 10 years, with some of the rivers facing more than one 100-year flood in that time period. These floods will challenge the rail companies in keeping their tracks safe. Continued flooding can have costly effects on the integrity of the railroad tracks and bed. Likewise continued flooding can affect the highways and bridges across the state.
- The EIS should examine the long-term viability of the railroads during the 40-year permit period or longer. Investments in improvements to the railroad tracks, signals, and rail bed will be made by the railroads themselves. The EIS should examine the long-term stability of the railroads and their financial ability to maintain the track. The EIS needs to review contingencies should the railroads show that they are unable to satisfactorily maintain the track during the 40-year permit period. Should the railroads be unable to maintain the track, then alternate funding sources need to be examined.
- Along with that, the Nuclear Regulatory Commission needs the ability to embargo the unit train carrying the spent fuel rods should the rail companies become unable to maintain the track to a high level of safety.
- The EIS needs to assess the ability to keep the unit train in good working order. Additionally the EIS needs to determine what backup engines and rail cars are necessary for keeping the shipments moving.
- The EIS needs to assess the ability of the rail company, the utility company, Holtec, and the United States Government to transfer a spent fuel canister from one rail car to another in an emergency.
- The EIS needs to review the ability of independent inspectors to monitor the safety of the track, with the ability to embargo shipments should the track become unsafe for the unit train to carry the spent fuel rods.
- The EIS needs to review the ability to halt shipments over track during times of floods, train malfunction, high heat which affects the rails and sometimes stops shipments over the rails, issues with repairing the track, and emergencies involving the rail line. Along with halting the shipments is the ability to safely and securely "park" the unit train.
- The EIS needs to review the financial ability of the utilities, rail companies, Holtec, and the United States government to protect and properly compensate communities, businesses, and residents should a spill or leak occur during shipment. If a canister fails during shipment, the local community can incur expensive costs in cleaning up the radiation and may find themselves permanently removed from a contaminated area.
- The EIS needs to evaluate the roads that will be used to transport the spent fuel from the power plant to the loading docks for the unit train, including what would be required to harden the roads to ensure that they can safely handle the trucks transporting the fuel. A special look should be taken to determine the safety of the bridges.
- The EIS should study locations for stationary dosimeters along the shipment routes, including, but not limited to, areas where the unit train is parked, the yard where the fuel canisters are loaded from the trucks to the train, and side tracks that could be used by the unit train.

Sincerely,

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