

**From:** Guntram Mueller <guntrammuel1@gmail.com>  
**Sent:** Saturday, September 12, 2020 6:22 PM  
**To:** Holtec-CISFEIS Resource; Guntram Mueller  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052 Draft Environmental Impact Statement Comment

Dear NRC Staff,

This is a public comment regarding the Draft Environmental Impact Statement (Docket ID NRC-2018-0052), concerning Holtec International's application for a license to construct and operate a "Consolidated Interim Storage Facility Installation for Spent Nuclear Fuel and High Level Waste" (NUREG-2237).

***I am strongly opposed to the granting of this license for the following reasons:***

1. I have seen pictures of highway bridges and railway bridges that have collapsed, and tossed trucks and rail cars from great heights into rivers below, or rocky crags below, and even a city below. These are not "once-in-a-century" events, but happen every few years, and must be expected to happen, and be planned for. If this were to happen to a spent fuel canister in a transportation cask, it cannot be ruled out that it would cause a leak in the canister. In response to questioning, Holtec's CEO, Dr. Kris Singh, has responded that:

- a) "It is not practical to repair a canister if it were damaged."
- b) One would need to repair it "in the face of millions of curies of radioactivity coming out of (the) canister."
- c) Instead, he recommends that "you can easily isolate that canister in a cask ..."

It is hard to see how this can be "easily" done, or even done at all, in disasters of these or similar types.

2. If Holtec were to receive that license, and build and fill the ISFSI, it would in effect be the world's most enormous "dirty bomb", just sitting there, waiting to be hit. This would release a massive plume of radioactive Cesium-137, possibly hundreds of thousands times as large as the plume released in the Chernobyl disaster. This plume, with the average prevailing winds, would travel up the middle of the country, and make a turn to exit the country over the most populated part of the East Coast. If a large bomb were to set off this calamity, it could make permanently unlivable the entire region that the plume went through.

Possibly, the consideration of a bombing of the ISFSI is not part of its "design basis".

a) Neither was the bombing of Pearl Harbor, even though the US fleet carried out its fuel blockade of Japan from there.

b) Neither was the 9/11 attack on the World Trade Center, even though that was the *second attack*.

***A bombing of the ISFSI, by possibly even a nuclear bomb, is certainly possible, as a great "force multiplier" for North Korea for example.*** Sleeping in your clothes and praying in church, as Defense Secretary Mattis did in 2017 because of the threat from North Korea, are wonderful, but even better would be ***not to build that giant "dirty bomb" in our midst in the first place.***

Sincerely,

Guntram Mueller

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