

From: Libbe HALEVY <info@email.actionnetwork.org>
Sent: Tuesday, September 15, 2020 8:24 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Oppose Holtec Facility Docket ID NRC-2018-0052

Nuclear Regulatory Commission,

WAKE UP YOU FRICKING IDIOTS!!!!!!

We'll start out with a paragraph of boilerplate, with which I completely agree:

I oppose the Holtec and Eddy-Lea Energy Alliance consolidated interim storage facility (CISF) in New Mexico. In this proposal there is a high risk potential of human error causing contamination of our environment with radioactive particles. The consequences would affect thousands of generations of life on earth.

Now here is my observation: This push for a so-called "interim" storage site is based on a legal fiction: namely, Yucca Mountain as the USA's designated long term storage facility for high level nuclear waste. But Yucca Mountain is nothing but a tunnel. It is built illegally on land belonging to the Western Shoshone people and still theirs to control under treaty rights. It is atop earthquake faults, in a volcano zone, and over an aquifer that provides water for eight states. In other words, an more inappropriate location for physical, moral and legal reasons would be hard to find.

But it's necessary to keep the myth of Yucca Mountain alive as a legal fiction so the push to build a nuclear waste dump in New Mexico can be framed as an "interim" consolidated waste storage facility. Nothing is further from the truth. If you manage to hornswaggle the nation into approving this, the waste will be deposited there in Holtec's usual sub-standard casks (SEE: San Onofre's 5/8" thin tin can canisters) and abandoned. It's called "kicking the can down the road," just far enough that you'll all be dead by the time this nuclear bill comes due. In essence, you're just cooking the linguistic books in order to make it appear that this will just be temporary, when long term, once that hellish, deadly waste is moved once, it's not going to be moved again - let alone to a site that will never be built but has already desecrated land held sacred by a native tribe.

I'll include the boilerplate, which is provided here, but the above are my personal thoughts. If you go through with this, every one of you is a genocidal maniac implicit in the destruction of people and the environment (catchy phrase, that, eh...?). - Libbe HaLevy, Los Angeles, CA.

I oppose Docket ID NRC-2018-0052 because the proposal:

1. is for an arbitrarily short storage period of 40 years
2. is opposed by Indigenous Peoples and hundreds of environmental groups
3. is not designed to withstand hundreds of years of heat, radiation, and environmental factors
4. violates the Nuclear Waste Policy Act of 1982, which prohibits the Department of Energy from taking ownership of high-level radioactive waste without the existence of an operating permanent disposal site
5. fails to require facility owners and managers to establish financial reserves to cover environmental restoration, personal injuries, emergency response, and loss of revenue and jobs for as long as radioactive material is on-site
6. lacks substantial evidence to determine if the nation's nuclear waste storage canisters and casks will remain in a physical condition sufficient to allow off-site transportation and on-site transfer to the proposed CISF
7. lacks an on-site dry transfer system (DTS), which is essential to repackaging aging and damaged canisters
8. does not fully address transportation risks. The crumbling infrastructure of the U.S. cannot support 80,000 tons of high-level radioactive waste transport
9. lacks contingency plans to contain radiation from the environment in the event of a failure in transportation or unloading. Catastrophes could be caused by natural disasters, human error, terrorism, or failure of infrastructure
10. is put forth by applicants, Holtec and Eddy-Lea Energy Alliance, that have a history of technical errors in operation and manufacturing, and are involved in several bribery scandals. Allowing these companies to construct and manage a site of this scope would be irresponsible and negligent

The NRC must reject this proposal as an agency tasked with regulating for health and safety on behalf of the public interest.

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