

From: Amanda Palucki <amanda@samuellawrencefoundation.org>
Sent: Monday, September 14, 2020 4:14 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Oppose Holtec Facility Docket ID NRC-2018-0052

Nuclear Regulatory Commission,

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.

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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