From: Linda Hanratty < llswenard47@gmail.com>
Sent: Monday, September 21, 2020 5:13 PM

**To:** Holtec-CISFEIS Resource

Subject: [External Sender] Docket No. 72-1050 (NRC-2016-0231), Interim

Storage Partners Draft EIS

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Nuclear Regulatory Commission (NRC)

Subject: Request to Reject Licensing of the Holtec High-Level Nuclear Waste Site, Docket ID NRC-2018-0052 Draft Environmental Impact Statement

Dear Nuclear Regulatory Commission Staff:

Holtec proposes the storage of a total of 173,600 metric tons of uranium over a 20-year period, 500 per year. According to the US Nuclear Waste Technical Review Board 2019 Report to Congress, "for decades, small-scale shipments of SNF have occurred. However, transporting large quantities of SNF and HLW has not been done and will require significant planning and coordination by the Department of Energy (DOE), the agency responsible for waste transportation under the Nuclear Waste Policy Act (NWPA)."

(https://www.nwtrb.gov/docs/default-

source/reports/nwtrb nuclearwastetransport 508.pdf?sfvrsn=6).

A significant portion of the HLW to be stored at the Holtec facility would likely travel on the Union Pacific rail lines through the middle of Fort Worth. The NRC defines the exposed population as a band approximately 0.5 miles on either side of the transportation route (the Union Pacific railroad tracks), in part, because the containers continuously emit a small amount of radioactivity, and even minor accidents, slow-moving rail cars, or stopped rail cars, would increase emissions. (http://www.state.nv.us/nucwaste/news2012/pdf/nureg2125.pdf

Fort Worth is the sixteenth largest city in the U.S. Rail tracks on the East and South sides of downtown Fort Worth are within one-half mile of parts of downtown Fort Worth including the Tarrant County Convention Center and Fort Worth City Hall. Union Pacific's Davidson Yard, Southwest of downtown Fort Worth, borders the Clear Fork of the Trinity River (a local water supply) and a large gas well pad. Well-used trails border the river and the railyard. Upscale apartments, homes, Colonial Country Club, and commercial uses are within the one-half mile of the yard, as is my upscale home.

Nineteen schools, two city halls, two libraries, a police department headquarters in Tarrant County, Texas, lie within the 0.5 miles of the tracks. Unfortunately, with nuclear radiation, a mask won't help, sequestering in your home won't help, and a ventilator won't help.

The nuclear waste rail cars are readily identifiable, given their huge dumbbell-like shape, size, and weight. One single railcar would carry more plutonium than was in the bomb dropped on Nagasaki and more Cesium than was released with the Chernobyl disaster. A fifty-mile radius is termed the area of influence, presumably because of the possibility of a major accident or terrorist attack. Such an event could be catastrophic to the Dallas Fort Worth Metroplex and its almost 7.6 million residents.

Licensing the Holtec facility would lead to tens of thousands of shipments of deadly radioactive waste coming through Fort Worth, creating risks from accidents, container cracks, and sabotage. Radioactive releases could threaten the health of people and businesses near the railroad tracks during transport, as well as creating ongoing risks for people living near the proposed interim storage sites.

This facility would be a threat to the safety of my family and my community, and if anything goes wrong, my tax money would be required to respond to it. Please fund hardened storage at existing nuclear power plants until a permanent waste site is approved. And then, find transportation routes that do not travel through high-population areas like the Dallas-Fort Worth Metroplex. Transporting large amounts of HLW through highly populated areas is an acceptable risk.

Federal Register Notice: 85FR16150

Comment Number: 3976

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