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# PUBLIC SUBMISSION

**Docket:** NRC-2018-0052

Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Comment On:** NRC-2018-0052-0376

Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Document:** NRC-2018-0052-DRAFT-0415

Comment on FR Doc # 2020-17536

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## General Comment

Please see below attachment as that is my comment.

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## Attachments

NRC-2018-0052-0376 comment

I am alarmed at the sloppiness and lack of attention to NEPA process done in an effort to transport and bury highly hazardous waste from 29 states of this nation. This DEIS is missing too many elements to minimize risks to the citizens of our country in a hurried attempt to improve bad situations in many locations. While those sites need immediate attention, it needs to be localized for now, with Federal funding to protect those citizens and species affected until a plan is safely composed for permanent disposal. Though designated as a temporary disposal site, we all know and should tell the truth about it very likely to become the permanent one. After all, moving this much even low level nuclear waste, as this DEIS shows, is a very hazardous event endangering the air and water sources of all the communities it travels through; and most incredibly, NM's population and environmental health. NM is no longer the "way-off" state it was in the 1950's and before. The population grows exponentially. The massive wildfires in the western edge of this country pushes migration east; and NM is one of the states we will see hosting this new migrant population.

This DEIS process, the one NEPA directs to include all interested/affected public, has been rushed through with minimal effort, that required by the law only, failing to involve or even notify the public of this transport through their towns and properties. It fails to take the risks of removal from deteriorating wastepile sites into account and show how they will be mitigated. It fails to even consider the specific risks to the larger population whose homes or utilities are along the many routes these wastes will pass, relying way too much on computer models to predict the dangers. Then it dumps a tremendous amount of waste in one place, one state... over a known geologic aquifer! This with no acknowledgement of the dangers of doing so, no identification of what agency will now be responsible to mitigate the dangers to the water supply of all affected (for instance) of that much toxic waste.

What the DEIS needs to address: 1) Total public involvement, including notification of all along the routes of transport; early involvement of the towns this waste now resides; and a NEPA style addressing of all concerns/ideas. 2) A modelling of the risks of transport based on real life similar waste accidents, a directive for scheduling transport around the growing number of hurricanes, tornadoes and fires; a list of directives/areas of mitigation Holtec will be responsible for and responsive to NRC to assess and perform; an assessment of the railroad infrastructure along each route (and plan to address); and a plan to mitigate any accidents that may occur in transport. 3) What protections of the Permian Basin below the planned burial site are to be taken? What agency will be in charge of this stockpile, to prevent! and mitigate accidents to it after it is deposited?

Frankly, I suspect keeping these waste materials in smaller stockpiles in their respective states (in most cases) is less dangerous to the public good than trying to stockpile it all in one place. All these stockpiles are now a national danger; and should be addressed, each individually nationally and paid for mitigation nationally. No mitigation will be failsafe; not in any state, including New Mexico. And that needs to be acknowledged.

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