

From: Stephanie Bilenko <sbilenko@sbcglobal.net>
Sent: Tuesday, September 22, 2020 12:29 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Docket ID NRC-2018-0052.

Dear NRC,
I oppose hauling "spent" fuel to Interim Storage Sites in New Mexico because:

- **Environmental racism.** It's no coincidence that the United States wants to make New Mexico a nuclear wasteland. It ranks as one of the poorest states and is a majority minority state, with more Black, Indigenous, People of Color (BIPOC) residents than white residents. For the NRC to determine that nuclear waste which will threaten life for millions of years would have "small" or "no environmental impact" is a blatant violation of environmental justice principles and is environmental racism in action. We do not give our own government license to allow a private industry to further contaminate New Mexicans' home or to expand the massive nuclear burden New Mexicans already bear.

- **Threats from Transporting Irradiated Nuclear Fuel.** I live in a Chicago suburb. Illinois has the most nuclear power plants than in any other state. Transport would be trafficked thru near to me. Not only New Mexico would be adversely impacted by the Holtec project: all communities along the transportation routes between nuclear power plants and Holtec's proposed CISF site would be threatened by radiation from the rail cars, and from the devastating financial and environmental damage if an accident or act of malice should occur. Studies have shown that one accident is likely to occur for every 10,000 shipments. It is irresponsible and dangerous for NRC to avoid adequate inclusion (a "hard look," as legally required by the National Environmental Policy Act, NEPA) of these mammoth risks and liabilities in its DEIS for Holtec's application.

- **Holtec's Project is Illegal.** Finally, under current U.S. law, this project is illegal. The Nuclear Waste Policy Act of 1982, as Amended, does not allow the federal government to take title to the high-level radioactive waste (commercial irradiated nuclear fuel) until a permanent geologic repository is operating. So the federal government cannot pay for transportation and storage of the waste as Holtec wants. Legally, the license cannot be issued until a permanent repository is operating.

Concerned Human,
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