

From: avatom@comcast.net
Sent: Tuesday, September 22, 2020 4:50 PM
To: Holtec-CISFEIS Resource
Cc: info@castenforcongress.com
Subject: [External_Sender] Docket ID NRC-2018-0052 Draft Environmental Impact Statement Comment

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Dear NRC staff,

I am writing to submit a public comment in response to the Draft Environmental Impact Statement (Docket ID NRC-2018-0052) regarding Holtec International's application for a license to build and operate a "Consolidated Interim Storage Facility for Spent Nuclear Fuel and High Level Waste" (NUREG-2237).

I am strongly opposed to the Holtec storage proposal because it is environmentally unsafe and could place Americans at risk of death if there should be an accident or act of terrorism and will poison up to eight states with the threat of more states becoming contaminated due to transporting on trains. Your proposal puts people, wildlife and precious water resources at significant and potentially deadly risk.

New Mexico Governor Michelle Lujan Grisham, New Mexico State Land Commissioner, Stephanie Garcia Richard, more than a dozen county and city governments, the Alliance for Environmental Strategies, the New Mexico Cattle Growers Association, the Permian Basin Coalition of Land & Royalty Owners and Operators, the Nuclear Issues Study Group, and the more than 30,000 residents who commented during the 2018 scoping period vehemently opposed bringing the nation's high level radioactive waste from nuclear power plants to communities in the southwest. Even though I do not live in New Mexico, I have many friends and relatives who do and I live very near a railway line that would be used to transport these hazardous wastes. I do not consent to having my state or any other state becoming a nuclear wasteland for millions of years.

Rather than adding 173,600 metric tons of high level radioactive waste to a state that has already been grossly overburdened, the United States should be directing its resources towards cleaning up the contamination already present in these states, providing just compensation, and holistic community health studies. The DEIS fails to account for cumulative impacts from the other proposal for Consolidated Interim Storage, approximately forty miles east at the current Waste Control Specialists low-level radioactive waste site.

It's no coincidence that the United States wants to make New Mexico a nuclear wasteland. It ranks as one of the poorest states in the country 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. I do not give our own government license to allow a private industry to further contaminate homes and communities or to expand the massive nuclear burden these communities already bear.

Holtec International and the NRC would have us believe that the site is a desolate, uninhabited place with “no historic value or significance.” This statement is completely false and without merit. The site is located near or on two lagunas or playa lakes: Laguna Gatuna and Laguna Plata. Lagune Plata is an archaeological district that has been extensively studied for decades. Two sites near Laguna Gatuna, where the nuclear waste is proposed to be stored, are listed on the National Register of Historic Places. Archaeologists have found a plethora of evidence of the Jornada Mogollon people, dating from 200 AD, 700 AD and 1200 AD. More than 200 archeological sites are located within six miles of the proposed nuclear waste dump. Laguna Gatuna, while often dry, fills with water after monsoon rains, attracting a variety of wildlife and hunters for millenia. The Hopi and Mescalero Apache nations have identified the area as culturally significant to them, and the Hopi nation has informed the NRC that traditional cultural properties could be adversely affected if this project proceeds. The site where Holtec wants to dump tens of thousands of tons of radioactive waste has profound historic value and significance.

The impact of this forever deadly nuclear waste would have devastating consequences on wildlife including threatened species that rely on the lagunas for drinking water and surrounding area as a critical habitat, including the Lesser Prairie Chicken, and the Dune Sagebrush Lizard. Agencies such as U.S. Fish & Wildlife, New Mexico Game & Fish, the Environmental Protection Agency (EPA) and New Mexico Environment Dept (NMED) have all gone on record attesting to the significance of Laguna Gatuna for migratory birds, and have argued that it should be designated permanently as a Water of the United States (WOTUS), which would make it eligible for protection under the Clean Water Act.

As I mentioned above, not only New Mexico would be adversely impacted by the Holtec project: all communities along the transportation routes between nuclear power plants and the Holtec proposed 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 inclusion of these mammoth risks and liability in its DEIS for Holtec's application.

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 until a permanent geologic repository is operating. So the federal government cannot pay for transportation and storage of the waste as Holtec wants. I do not give the U.S. government permission to use my tax dollars to transport and store hazardous nuclear waste. The license cannot be issued until either a permanent repository is operating, or U.S. law is changed.

For all the above reasons and more, I declare that the DEIS for Holtec's application is inadequate and further that the license for a high level radioactive waste storage facility should be denied. In conclusion, high level nuclear waste from nuclear power plants around the U.S. should not be transported throughout the U.S. to New Mexico—it should be isolated on or near the current site until there is an environmentally just and scientifically sound option available.

Sincerely,

Ava Cohn
Barrington, IL

Federal Register Notice: 85FR16150
Comment Number: 4467

Mail Envelope Properties (370488276.38338.1600807821828)

Subject: [External_Sender] Docket ID NRC-2018-0052 Draft Environmental Impact
Statement Comment
Sent Date: 9/22/2020 4:50:21 PM
Received Date: 9/22/2020 4:50:26 PM
From: avatom@comcast.net

Created By: avatom@comcast.net

Recipients:

Post Office: connect.xfinity.com

Files	Size	Date & Time
MESSAGE	6466	9/22/2020 4:50:26 PM

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Priority: Standard
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