

From: David Rosen <info@sg.actionnetwork.org>
Sent: Saturday, September 19, 2020 7:09 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Halt the license for radioactive waste storage

office of administration,

Office of Administration

Mail Stop: TWFN-7-A60M

Attn: Program Management, Announcements and Editing Staff

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

RE: Draft Environmental Impact Statement (DEIS), Docket No. 72-1050; NRC-2016-0231 Interim Storage Project's license application to construct and operate a Consolidated Interim Storage Facility (CISF) for spent nuclear fuel (SNF) and Greater-Than Class C (GTCC) waste.

Dear NRC Commissioners and Staff,

Interim Storage Project's application would lead to the import and storage of 40,000 tons of spent nuclear fuel from nuclear reactors around the country in Andrews County, Texas, for 40 years, or perhaps forever. This environmentally unwise idea would endanger our nation's security. If there is an accident through the Permian Basin, an area that produces 25% of our nation's petroleum supplies, fuel for our nation's defense will be endangered. Given the location of the proposed site, in the heart of the largest oil producing areas and given the number of truck and train loads that will be delivered, an accident of some sort is likely. Given the proximity to Mexico, terrorism is a real possibility.

Nationwide, this plan would jeopardize the health and safety of millions of people unnecessarily due to risks from potential leaks, sabotage or transportation accidents. Consolidated interim storage is an illegal band-aid approach to radioactive waste problems that fails to get the waste into permanent disposal for long-term isolation.

The NRC has ignored many key health and safety issues raised in thousands of previous

comments and in 100 legal contentions, many of which were backed by expert testimony. The inadequate Draft Environmental Impact Statement (DEIS) shows that the NRC is still not addressing these concerns.

No hot cell is proposed, which should be mandatory for this type of facility. There would be no way to repackage radioactive waste from a cracked or leaking canister, and no way to move it anywhere as a result.

There is no discussion of whether the waste could go critical and under what conditions this could occur. Hardened Onsite Storage Systems (HOSS) was not considered as an alternative to Consolidated Interim Storage, a glaring omission.

Transportation routes were not designated and accident risks have been artificially minimized. State of Nevada Yucca Mountain studies found that a single small accident could permanently contaminate 42 square miles of land. Radioactive Waste Management Associates' found that 1370 latent cancer fatalities could result from a rail accident with spent nuclear fuel, with costs of \$145 - \$270 billion for a severe accident. The DEIS ignores available scientific data and wrongly minimizes these risks.

The DEIS fails to adequately analyze cumulative impacts of the proposed facility and nearby sites on workers, local people and the environment. Natural disasters or an accident could create cumulative impacts. A fire and a subsequent radiation release at the nearby WIPP site cost \$2 billion to remediate, but this was never mentioned. The DEIS fails to analyze impacts of potential groundwater could have on viability of the storage pad, which must be able to support extremely heavy casks and canisters.

The risks of creating a dangerous de facto permanent site interim were not included, although Former NRC Chairman Gregory Jaczko has said that a consolidated interim storage facility should be viewed as a permanent facility. Nuclear waste should not be moved across the country to a site not designed for permanent disposal.

Though this area may appear to be desolate, tens of thousands of oil field workers are actively producing petroleum within a hundred mile radius of the WCS site. An accident might put those folks out of work for years as the accident is cleaned up, not to mention the billions

of dollars a cleanup would cost.

I oppose Consolidated Interim Storage at this and other sites. Any "interim" storage is absurd. Though we are not likely to be here in 40 or 100 years, we can predict that once sited, this waste will wind up never being moved, because 40 or more years of hot sun, frequent earthquakes and frost heaving will make any movement of these canisters folly. Stop this madness and wait until there is a permanent repository.

Sincerely yours,

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Federal Register Notice: 85FR27447
Comment Number: 3927

Mail Envelope Properties (5f668f97a25de_19003fc4abf4c75c1303a2)

Subject: [External_Sender] Halt the license for radioactive waste storage
Sent Date: 9/19/2020 7:09:11 PM
Received Date: 9/19/2020 7:09:19 PM
From: David Rosen

Created By: info@sg.actionnetwork.org

Recipients:

Post Office: ip-10-0-0-69.mail

Files	Size	Date & Time
MESSAGE	4693	9/19/2020 7:09:19 PM

Options
Priority: Standard
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Expiration Date:
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