

**From:** The Rev Dr Edward Kern (amazinggrace3@sbcglobal.net) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Thursday, September 17, 2020 10:24 PM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] Docket Reference: NRC-2016-0231 Don?t dump on Texas -- Deny the radioactive waste storage license

Dear Reference Docket ID NRC-2016-0231,

The Nuclear Regulatory Commission (NRC) is currently considering turning an existing ?low-level? radioactive waste site in west Texas into a much more dangerous high-level radioactive waste storage site. This new permit would allow the site to import the most dangerous types of waste from nuclear reactors across America, which would travel through major cities like San Antonio, Dallas, Fort Worth, Midland and Odessa, as well as highways and rail lines in New Mexico, Oklahoma and communities of color on the border between New Mexico and Texas.

The Nuclear Regulatory Commission is seeking public comments on its draft Environmental Impact Statement, which downplays the many risks that would occur by bringing highly radiated waste from the nation?s nuclear power plants over highways and rail-lines to west Texas.

Dumping nuclear waste on the Southwest region would be a massive environmental injustice. Millions of people who live near ports and railroad tracks across the country would also be put at risk from leaks, accidents, or sabotage from irradiated fuels rods. Exposure to radiation leads to cancers, birth defects, and death. 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. The storage would be located next to Waste Control Specialists existing low-level radioactive waste disposal and storage facility. This environmentally unjust plan would target a largely Latinx region of the country with the deadliest nuclear waste. The region is unsuitable for storing nuclear waste since it?s prone to earthquakes, sinkholes, temperature extremes, wildfires, intense storms and flooding.

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.

I oppose Interim Storage Project's plan to store dangerous high-level nuclear waste in Andrews County, Texas. This environmentally unjust plan would target a largely Latinx region of the country with the deadliest nuclear waste. The region is unsuitable for storing nuclear waste since it?s prone to earthquakes, sinkholes, temperature extremes, wildfires, intense storms and flooding. The hydrogeology of the site is still uncertain.

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.

Some of the many concerns that have not been addressed by this application include:

- Threats from terrorism aren't adequately addressed and the potential use of drones wasn't considered.
- Transportation routes were not designated and accident risks have been artificially minimized.
- The DEIS fails to adequately analyze cumulative impacts of the proposed facility and nearby sites on workers, local people and the environment.
- The risks of creating a dangerous de facto permanent site were not included, and nuclear waste should not be moved across the country to a site not designed for permanent disposal.

This nation must end environmental injustice and halt disproportionate impacts on people of color. Dumping the most toxic nuclear waste of a whole nation on the largely Latinx Southwest region is the height of environmental injustice. The site is only a few miles from communities like Eunice and Hobbs, New Mexico, and the waste would flow through many densely populated communities of color on its way there.

I oppose Consolidated Interim Storage at this, and other sites. The NRC should protect public health and safety, the economy and the environment, by halting the application process and denying the license for Consolidated Interim Storage.

Sincerely,

The Rev Dr Edward Kern  
1310 Crumpet  
San Antonio, TX 78253  
amazinggrace3@sbcglobal.net  
(210) 679-6888

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at [core.help@sierraclub.org](mailto:core.help@sierraclub.org) or (415) 977-5500.

**Federal Register Notice:** 85FR27447  
**Comment Number:** 4054

**Mail Envelope Properties** (STQprwyYTJ-oKpRedcg1SA)

**Subject:** [External\_Sender] Docket Reference: NRC-2016-0231 Don?t dump on Texas --  
Deny the radioactive waste storage license  
**Sent Date:** 9/17/2020 10:23:44 PM  
**Received Date:** 9/17/2020 10:23:50 PM  
**From:** The Rev Dr Edward Kern (amazinggrace3@sbcglobal.net) Sent You a Personal  
Message

**Created By:** automail@knowwho.com

**Recipients:**

**Post Office:** ismtpd0139p1mdw1.sendgrid.net

Files	Size	Date & Time
MESSAGE	4651	9/17/2020 10:23:50 PM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**