

**From:** Cathy Wallace <info@sg.actionnetwork.org>  
**Sent:** Sunday, October 4, 2020 12:12 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 unjust plan and 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.

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.

Threats from terrorism aren't adequately addressed and the potential use of drones wasn't considered. 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.

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.

It's time to protect the land, air and water, wildlife, plant life and aquifers of this region

and transport regions along the way. Businesses at risk include pecan growers, the ranching and dairy industries and the oil and gas industry.

I oppose Consolidated Interim Storage at this, and other sites. The DEIS fails to adequately analyze environmental and cumulative impacts and the socioeconomic risks of the proposed radioactive waste storage application. 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.

Oct. 1, 2020

I am in opposition of the proposal that facilitates the transport of high level nuclear waste across our country to be stored in West Texas and New Mexico. The health and lives of people all across the United States are at risk of being exposed to this deadly waste in transport and after it reaches this location.

As a person that has experienced hundreds of earthquakes from oil and gas operations in Texas, I strongly urge you to keep the waste where it resides and secure the integrity of the containers that hold it.

The US Dept. of Interior US Geological Survey issued a report that states there are at least 21 fault lines in the West Texas area. In the past month alone, the proposed site in West Texas has had 44 earthquakes. On March 26, 2020 there was a 5.0 magnitude earthquake in Mentone, TX that is only 80 miles from Andrews, TX. When these frackquakes occur they are much closer to the surface than deeper natural quakes. Therefore, ground movement and damage is much more intense. I have seen the damages created by the constant shaking from smaller earthquakes. In 2015, while hundreds of 2.0 magnitude quakes occurred in Irving, TX, I watched my walls, bricks and concrete pier and beams crack and split. I watched water and gas lines break and sinkholes appear in my neighborhood. Over time, damages from these West Texas earthquakes could be catastrophic to the containers holding this high level radiation.

West Texas has also developed sinkholes near the Ogallala Aquifer due to the recurring earthquakes in this area. Should the aquifer be compromised by radiation leaks, the largest

aquifer in North America that supplies water for America's crop irrigation would be gone forever.

In May of 2019, SMU geophysicist Zhong Lu was interviewed by CBS to discuss the ongoing issue of the sinking ground in West Texas. So far, two large sinkholes have formed near Wink, Texas. But Lu notes that the problem is only expected to get worse over time, due to the Permian Basin in Wink and other neighboring towns having a layer of salt below the ground. In many cases, oil and gas drilling has allowed leaking water to soften that salt layer and cause the surface to cave in. Lu and fellow SMU geophysicist Jin-Woo Kim have done a series of studies on the phenomenon of the ground sinking at alarming rates in West Texas. Earlier studies have revealed significant ground movement that suggests the two existing holes are expanding and new ones are forming. The researchers used satellite radar images that were made public by the European Space Agency, and supplemented that with oil activity data from the Railroad Commission of Texas to connect the cause of these sinkholes. Lu Said...."the deterioration can cause serious problems for the people in Wink. I think if you live in that area, I would be very concerned." Therefore, the ground in West Texas has already reached dangerous levels of deterioration which would not support any kind of radioactive waste being stored there. This should be considered in the current environmental and baseline assessments.

The effects of radiation poisoning are devastating to humans. 2 years ago, my friend watched her husband die a slow and painful death from the effects of cancer caused by radiation leaks from the Cold Water Creek facility in St. Louis. As a child, her husband unknowingly played in the contaminated creek with many other children near this nuclear waste dump site. Most all of them have ended up with latent cancers in adulthood and many have died from these cancers. Exposure to this high level radiation can show up years after exposure.

If you care about future generations, I implore you to reconsider implementing this plan. I oppose this project.

I also urge you to consider holding a live in-person hearing after the risks of Covid have diminished, possibly a year from now, leaving the comment period open until then.

Sincerely,

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