

**From:** Sally Jane Gellert <info@sg.actionnetwork.org>  
**Sent:** Saturday, September 12, 2020 9:42 AM  
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**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 40,000 tons of irradiated nuclear fuel rods from many nuclear reactors around the country being imported into and stored in Andrews County, Texas, for 40 years—or perhaps forever. There are no clear plans for what would happen after the proposed “interim” period or in case the fuel cannot be transferred to another container for a later move.

As if that is not concerning enough, 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. In addition, the area has a lot of oil and gas extraction, potentially creating risk of fires and explosions in the vicinity of nuclear waste.

Nationwide, this plan would jeopardize the health and safety of millions of people unnecessarily due to risks from potential leaks, sabotage or transportation accidents. To get

to the proposed site, the irradiated fuel rods would have to travel through many counties that do not currently have nuclear reactors—areas in which first responders have no experience with radioactive waste.

Consolidated interim storage is an illegal Band-aid approach to problems of radioactive waste; it fails to get the waste into permanent disposal for long-term isolation, which is what is needed to protect us all as much as possible.

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. Until these concerns are addressed, no plan is sufficient.

No hot cell is proposed, though it is critical that there be a hot cell at this type of facility—this is mandatory, not optional. Without a hot cell, there is 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. The DEIS includes 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, as it seems to be the safest option for storing radioactive waste.

Transportation routes were not designated and accident risks have been artificially minimized. State of Nevada studies of Yucca Mountain proposals 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 resulting from a severe accident. Such an accident could happen anywhere along a transport route. 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—a similar fire could happen at the proposed facility, and implications of that must be addressed in a comprehensive EIS. In addition, the DEIS fails to analyze impacts that 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. There is no clear path for moving the waste out of the proposed site, and we should have learned from history that without plans, the waste remains—so permanent storage is clearly a possible outcome and must be considered. 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 the many 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 is charged with protecting public health and safety, the economy, and the environment, and it once again fails to do so in this DEIS. It is imperative that you halt the application process and deny a license for Consolidated Interim Storage.

Thank you,

Sally Jane Gellert  
sjguu@aol.com

210 Broadway

Woodcliff Lake, NJ, New Jersey 07677

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