

**From:** Beki Halpin (beki.halpin@gmail.com) Sent You a Personal Message  
<automail@knowwho.com>  
**Sent:** Thursday, September 17, 2020 3:20 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,

This storage site is a Ponzi scheme. To keep this storage facility (desert dumping ground) funded, they must continually keep bringing waste in to keep up a revenue stream. There is no plan for this site to be closed. There is no alternative site. So the financial success depends on more and more waste being delivered. There is also no plan to repackage waste as the canisters age and fail. There is no plan for repackaging waste when canisters fail before they age. There is no contingency fund being created to cover the inevitable incident, accident or terrorist attack that will release radiation either locally or for hundreds of miles around. This facility, if you want to call it that, is for short term profit for corporations who will pull up their skirts and leave the minute an expensive radioactive incident occurs and leave the taxpayer holding the bag and babysitting a crumbling radioactive time bomb. No permit should be issued until there is a permanent site is permitted. This nuclear waste should stay where it is on the sites where it was produced until a final site is permitted, a site that really is appropriate for permanent storage for thousands of years. This site is not suitable. These canisters are not suitable. Dragging the stuff across the country in these flimsy, easily identifiable containers is reckless. This is a highly inappropriate place to set these containers and cannot really be called a storage site, it is really just a desert dumping ground. No permit should be issued for this dangerous taxpayer fleecing boondoggle.

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,

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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:** 4512

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Deny the radioactive waste storage license  
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