

From: Kevin Kamps <kevin@beyondnuclear.org>
Sent: Tuesday, October 6, 2020 12:52 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Beyond Nuclear's 4th set of public comments, on NRC's ISP/WCS CISF DEIS, re: Docket ID NRC-2016-0231, and report number NUREG-2239 -- large impacts/risks of high-level radioactive waste transportation, lack of shipment route maps

Submitted via <WCS_CISF_EIS@nrc.gov>

Dear NRC Staff,

We submit these comments on behalf of our members and supporters, not only in New Mexico and Texas, near the targeted ISP/WCS CISF site, but across both of these states, and the rest of the country, along road, rail, and waterway routes that would be used for high risk, highly radioactive waste shipments to ISP's CISF, as well as to Yucca Mountain, Nevada, on Western Shoshone land -- wrongly and illegally assumed by ISP/WCS, as well as by NRC, to someday become a permanent disposal repository.

The following subject matter has gotten little to no attention in NRC's ISP/WCS CISF DEIS, a far cry from NEPA's legally binding "hard look" requirement: the large impacts, and high risks, of high-level radioactive waste (irradiated nuclear fuel) transportation. One of NRC's greatest failings is the lack of shipment route maps.

On behalf of our members and supporters in New Mexico, and beyond throughout the Lower 48 states along transport routes (road, rail, and/or waterway) that would be used to haul irradiated nuclear fuel and other highly radioactive waste (such as Greater-Than-Class-C so-called "low" level radioactive waste to the ISP/WCS CISF in Texas), we protest NRC's woefully inadequate, to nearly non-existent, treatment of highly radioactive waste transport risks central to the proposed scheme, as well as the secrecy surrounding transport routes.

This violates the long-established legal requirement under the National Environmental Policy Act (NEPA) that NRC take a "hard look" at the ISP/WCS CISF proposal, including its inextricably linked high-risk transportation component, impacting most states in the Lower 48.

NRC cites a 2008 Final Supplemental Environmental Impact Statement on the proposed Yucca Mountain, NV dump targeting Western Shoshone Indian land. NRC cites the 2008 DOE document as part of its excuse for not having to do an ISP/WCS-specific transport analysis in 2020 in its own DEIS for the proposed CISF.

In 2017, Fred Dilger, utilizing that same 2008 DOE document, on behalf of the State of Nevada Agency for Nuclear Projects, published a set of route maps, showing road and rail routes admitted by DOE as the most likely to be used to haul highly radioactive wastes to Yucca Mountain, NV.

Dilger's route maps are posted online under the year 2017, here:

<http://www.state.nv.us/nucwaste/trans.htm>

It should be noted that the further away from the American Southwest such shipments originate, the more similar or even identical the routes for hauling highly radioactive wastes, whether bound for NV or TX -- or NM, for that matter. After all, the proposed TX and NM CISF sites are but 40 miles apart, across the state line.

To round out the complete picture, DOE also published barge route maps in its Feb. 2002 Final EIS on Yucca. Beyond Nuclear has posted these barge route maps for potential [barge shipments](#) into ports on bays, rivers, harbors, lakes, and seacoasts across the country, at the following online link:

<http://www.beyondnuclear.org/waste-transportation/2017/6/29/potential-barge-routes-on-us-surface-waters-to-ship-high-lev.html>

For its part, [ISP/WCS's Environment Report accounts for routes to NM from only four of our country's total of 131 atomic reactors](#) (95 still operating, 2 under construction, 34 permanently shutdown) -- three at San Onofre, CA and one at Maine Yankee -- but NRC's DEIS didn't even include [this sole, inadequate map!](#) Specifically, [Figure 4.2-3, Transportation Routes, Page 4-65, Chapter 4, WASTE CONTROL SPECIALISTS LLC, ENVIRONMENTAL REPORT, Revision 0.](#)

Compare ISP/WCS's sole map, to [this more comprehensive map, produced by the State of NV re: the Yucca dump targeting Western Shoshone land](#), based on the same 2008 DOE Final Supplemental EIS that NRC cites in its 2020 ISP/WCS CISF DEIS: <http://www.state.nv.us/nucwaste/news2017/ymroutes17.png>).

NRC's DEIS, and ISP/WCS's ER, essentially exclude the high risks of transport, and are not even being transparent about transport routes. This represents segmentation (the dividing up of a major federal action into smaller parts, so that the proposal doesn't seem so significant or impactful after all). This is a violation of NEPA, as long ruled so by the federal courts.

Please address your woefully inadequate "hard look" under NEPA, re: this health-, safety-, and environmentally-significant subject matter above.

And please acknowledge your receipt of these comments, and confirm their inclusion as official public comments in the record of this docket.

Thank you.

Sincerely,

Kay Drey, President, Board of Directors, Beyond Nuclear

and

Kevin Kamps, Radioactive Waste Specialist, Beyond Nuclear

--

Kevin Kamps
Radioactive Waste Specialist
Beyond Nuclear
7304 Carroll Avenue, #182
Takoma Park, Maryland 20912

Cell: (240) 462-3216

kevin@beyondnuclear.org

www.beyondnuclear.org

Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abolish both to safeguard our future. Beyond Nuclear advocates for an energy future that is sustainable, benign and democratic.

Federal Register Notice: 85FR27447
Comment Number: 4625

Mail Envelope Properties (CAFNCop6VtEEUO+FbzEsqCuRbfDrp1LGDVWdJ-HD99UA2afmX7g)

Subject: [External_Sender] Beyond Nuclear's 4th set of public comments, on NRC's ISP/WCS CISF DEIS, re: Docket ID NRC-2016-0231, and report number NUREG-2239 -- large impacts/risks of high-level radioactive waste transportation, lack of shipment route maps

Sent Date: 10/6/2020 12:52:07 PM

Received Date: 10/6/2020 12:52:24 PM

From: Kevin Kamps

Created By: kevin@beyondnuclear.org

Recipients:

Post Office: mail.gmail.com

Files	Size	Date & Time
MESSAGE	6820	10/6/2020 12:52:24 PM

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received: