

From: LeagueOf WomenVoters <lwvtarrant@gmail.com>
Sent: Thursday, October 8, 2020 1:25 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Docket No. 72-1050 (NRC-2016-0231 Consolidated Interim Storage Facility Project)



P.O. Box 100175

Fort Worth, Texas 76185

To: Nuclear Regulatory Commission (NRC) WCS_CISF_EIS@nrc.gov.

Subject: Docket No. 72-1050 (NRC-2016-0231 Consolidated Interim Storage Facility Project)

Comment: Deny a license to this project.

The League of Women Voters of Tarrant County, Texas, respectfully requests that the NRC deny a license to Interim Storage Partners, LLC/Waste Control Specialists, LLC (ISP), for this project. We are concerned about the interim storage of high-level nuclear waste (HLW) above ground in a privately owned facility in Andrews County, Texas. We are also deeply concerned about the risks of transporting HLW through the United States. Of particular concern is the potential impact on our urban county and its 2,139,860 residents.

We further ask that, at a minimum, the Nuclear Regulatory Commission (NRC) hold in-person public hearings along the proposed transportation routes, including one in Tarrant County, Texas, once COVID-19 is under control. This would mean lengthening the comment period for ISP from November 3, 2020, to allow for adequate public input on this important matter. Participating in your webinars require a computer, a smart phone, and the ability to navigate a difficult interface. In addition, the vast majority of residents and elected officials in Tarrant County have no idea that high-level nuclear waste might be coming soon to their railroad tracks, because the current Environmental Impact Statement (EIS) ignores the impact the transportation of high-level nuclear waste (HLW) would have on communities along the likely rail routes, especially with respect to possible accidents or terrorist attacks.

ISP proposes to move over 40,000 metric tons of spent nuclear fuel (SNF) over a 20-year period, or up to 425 casks each year. According to the US Nuclear Waste Technical Review Board 2019 Report to Congress, "for decades, small-scale shipments of SNF have occurred. However, transporting large quantities of SNF and HLW has not been done and will require significant planning and coordination by the Department of Energy (DOE), the agency responsible for waste transportation under the Nuclear Waste Policy Act (NWPA)." (https://www.nwtrb.gov/docs/default-source/reports/nwtrb_nuclearwastetransport_508.pdf?sfvrsn=6).

A significant portion of the HLW that the ISP facility would store would probably travel on the Union Pacific rail lines. The NRC defines the exposed population as a band approximately 0.5 miles on either side of the transportation route, in part because the containers continuously emit a small amount of radioactivity, and minor accidents, slow-moving rail cars, or stopped rail cars, would increase emissions. (<http://www.state.nv.us/nucwaste/news2012/pdf/nureg2125.pdf>)

The Union Pacific Railroad tracks run through the middle of Tarrant County, from east to west and from north to south. The tracks east and south of downtown Fort Worth come within one-half mile of parts of downtown Fort Worth, including the Tarrant County Convention Center and Fort Worth City Hall.

Tower 55, a major rail intersection that handles over 100 trains per day lies just southeast of downtown Fort Worth. Trains coming from the north would have to turn west at this intersection. Recent improvements have lessened this bottleneck, but some delays likely still occur.

Union Pacific's Davidson Yard, Southwest of downtown Fort Worth, borders a large natural gas well site and the Clear Fork of the Trinity River (a major water supply). Well-used trails border the river and the railyard. Upscale apartments, homes, Colonial Country Club, and commercial uses are within one-half mile of the yard.

The Arlington main library, Arlington City Hall, Arlington Police Headquarters, Watauga library, Watauga City Hall, and nineteen schools lie within 0.5 mile of the tracks, along with numerous residential, industrial, and commercial uses. Some of the schools are only approximately 0.10-mile from the tracks. The railroad tracks also cross major streets at grade, posing heightened accident risks, as well as delays.

The nuclear waste rail cars are readily identifiable, given their huge dumbbell-like shape, size, and up to 150-ton weight. One single railcar would carry more plutonium than was in the bomb dropped on Nagasaki and more Cesium than was released with the Chernobyl disaster. Unfortunately, with nuclear radiation, a mask will not help, sequestering in your home won't help, and a ventilator won't help.

Licensing the ISP facility would lead to tens of thousands of shipments of deadly radioactive waste coming through Tarrant County, creating risks from accidents, container cracks, and sabotage. Radioactive releases could threaten the health of people and businesses near the railroad tracks during transport, as well as creating ongoing risks for people living near the proposed interim storage sites. The EIS does not address accident response, though locally funded fire departments would likely be the first responders on the scene.

The League of Women Voters of Tarrant County considers this license to be a threat to the long-term safety of our community and our state. We support funding for hardened storage at existing nuclear power plants until a geologically safe, below-ground, permanent waste site is approved, preferably one owned and operated by the Federal Government. State and local governments should not be left with potentially astronomically high clean-up costs. Future HLW transportation routes should by-pass high-population areas, like the Dallas-Fort Worth Metroplex, because transporting HLW through highly populated areas is a risk not addressed in the IPS EIS.

Sincerely,

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