

**From:** Kevin Kamps <kevin@beyondnuclear.org>  
**Sent:** Tuesday, October 13, 2020 2:27 PM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] No nuclear waste in Texas

Dear Nuclear Regulatory Commission,

Dear NRC Commissioners and Staff,

Interim Storage Project's application to store radioactive waste in Texas would bring in 40,000 tons of spent nuclear fuel from nuclear reactors around the country.

The plan would target a Latinx community with deadly nuclear waste. Stored waste would be at risk from earthquakes, sinkholes, temperature extremes, wildfires, intense storms and flooding.

Consolidated interim storage is an illegal approach that does not solve our nuclear waste problem. With this proposal, the NRC has ignored expert testimony, local opposition, and tens of thousands of written and oral comments.

The Draft Environmental Impact Statement is deficient because it fails to:

- Account for disproportionate impacts to low-income communities of color (environmental justice communities) in the American Southwest and along transport routes.
- Details transportation routes and consider nationwide risk to millions of Americans along transport routes.
- Consider the risk of leaks, sabotage or transportation accidents.
- Include a plan to repackage leaking waste casks and a plan to move waste when required.
- Complete the required alternatives analysis by considering Hardened Onsite Storage Systems (HOSS) as an alternative to Consolidated Interim Storage.
- Consider past nuclear waste accidents that have cost hundreds of millions to billions of dollars to clean up.
- Detail cumulative impacts of the proposed facility and nearby sites on workers, local people, and the environment.
- Analyze potential for groundwater contamination.

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.

I also oppose the nonsense of multiplying transport risks, and EJ burden, that is inherent in consolidated interim storage. As ISP/WCS itself admitted in its Environmental Report, the outbound shipments from the CISF, heading to Yucca Mountain, NV for permanent burial, would travel through the very same communities in NM, TX, and OK that had already seen the inbound shipments, carrying irradiated nuclear fuel from eastern reactors, to the CISF in the first place. This makes no sense, and merely increases risks and EJ burdens.

Lastly, ISP/WCS, as well as NRC, simply assuming Yucca will be the permanent dump, is unacceptable. Yucca is Western Shoshone land. The 33-year long attempt to dump radioactive wastes there is a violation of the Treaty of Ruby Valley of 1863, the highest law of the land, equal in stature to the U.S. Constitution itself. It is also an EJ violation, considering the deadly radioactive fallout already suffered by the Western Shoshone, and others downwind and downstream from the NV (Nuclear Weapons) Test Site.

Sincerely,  
Kevin Kamps  
Beyond Nuclear 7304 Carroll Avenue, #182  
Takoma Park, MD 20912

**Federal Register Notice:** 85FR27447  
**Comment Number:** 5723

**Mail Envelope Properties** (40eaa269-cb10-482d-a4da-029275193d2f)

**Subject:** [External\_Sender] No nuclear waste in Texas  
**Sent Date:** 10/13/2020 2:26:57 PM  
**Received Date:** 10/13/2020 2:26:59 PM  
**From:** Kevin Kamps

**Created By:** kevin@beyondnuclear.org

**Recipients:**

**Post Office:** salsalabs.org

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3154	10/13/2020 2:26:59 PM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**