

From: Patrice Sutton <psutton2000@yahoo.com>
Sent: Thursday, October 15, 2020 2:49 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Docket ID, NRC-2016- 0231
Attachments: 2020 10 15 Patrice Sutton NRC Texas Comments.pdf

Dear NRC:

Attached please find a hard copy of my comments made today during the public hearing (virtually) regarding the **WCS' Draft Environmental Impact Statement (DEIS)**.

Thank you,

Patrice Sutton

Federal Register Notice: 85FR27447
Comment Number: 7254

Mail Envelope Properties (2113164412.820110.1602787763860)

Subject: [External_Sender] Docket ID, NRC-2016- 0231
Sent Date: 10/15/2020 2:49:23 PM
Received Date: 10/15/2020 2:49:31 PM
From: Patrice Sutton

Created By: psutton2000@yahoo.com

Recipients:

Post Office: mail.yahoo.com

Files	Size	Date & Time
MESSAGE	211	10/15/2020 2:49:31 PM
2020 10 15 Patrice Sutton NRC Texas Comments.pdf		167300

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

**Comments presented October 15, 2020 (virtually) to the NRC Re: Docket ID, NRC-2016- 0231
WCS' Draft Environmental Impact Statement (DEIS)**

My name is Patrice Sutton, I'm with San Francisco Bay Physicians for Social Responsibility. I am an environmental health scientist with decades of public health experience. I am also with the University of California San Francisco Program on Reproductive Health and the Environment.

In my role as the Chair of the SF Bay PSR Environmental Health Committee I am here to say a loud and clear NO to your proposal to move thousands of shipments of highly toxic radioactive waste across the U.S. over 20 years and deposit them in Texas. We strongly reject the findings of the Environmental Impact Statement and oppose the NRC's licensing of this facility.

Regarding the EIS findings, the NRC presentation lists public health concerns related to our air and water and concludes that "all of the impacts will be "Small", defined as "Environmental effects are not detectable or are so minor that they will neither destabilize nor noticeably alter any important attribute of the resource."

This virtual guarantee of current and future stewardship of our health and ecosystem is simply not scientifically credible.

The NRC's premise that long-lived highly toxic nuclear waste will be shipped and stored without incident from reactors across the U.S. is the epitome of denying the reality, speed and intensity our climate emergency.

We live an era of climate change and associated societal transformation.

Right now, in the Southwest and along the proposed transportation routes, depending on the window you are looking through, climate change looks like fire, floods, and/or dry-parched land, all of which directly influence our air and water, and the movement of people.

Yet the EIS concludes on page 4-97 that " *If* climate change ... create(s) conditions adverse to safety, the NRC has sufficient time to require corrective actions", and, on page 344 it summarizes what can only be described as magical thinking, where groundwater is recognized to be impacted, there is a plan to mitigate the impacts, and that after decommissioning, these impacts will cease.

We understand this to mean that the NRC believes that moving this waste to Texas will ultimately not affect groundwater, despite the proximity of the proposed site to our nation's largest aquifer.

Ground water is not a stable, predictable enterprise and it will certainly change over the relevant time frames from climate disruption. Moreover, the NRC's conclusion does not account for the synergistic harms to our water related to regional oil and gas extraction operations and from the two other operating neighboring nuclear facilities.

Our climate emergency already is, and will increasingly, wreck-havoc with even the most health conservative assumptions as to where groundwater will flow, where fires will rage, and where people will live.

The NRC's proposal is also supremely unjust, and the injustice embedded in this proposal is neither random nor time limited.

The communities impacted across the transportation routes and in the Southwest are poorer, and often marginalized communities of color. These communities have yet to be invited into the conversation in a meaningful way.

In light of the time frames for which the waste will be hazardous, the injustice embedded in this proposal will be perpetuated over generations to come.

An NRC license would purposefully and perpetually embed environmental injustice into the DNA of our country when legally and morally we should be dismantling these structural inequities.

As a first step, the NRC needs to go back and look at its essential role in enabling nuclear power in full knowledge that there was not a solution to its waste stream that could possibly be protective of public health for relevant time frames.

In light of this dishonest and disastrous historical record, we urge you to then re-imagine a solution that is at least honest in terms of the harms, and which views the problem through a lens of health and justice. You are rushing forward with the same blind expedience that got us into this radioactive mess. This is simply unconscionable.

Your plan is billions for band-aids when what we need is a permanent and just solution.

In conclusion, as scientists and health professionals we stand in solidarity with the communities that will bear a disproportionate harm from transporting and dumping 40,000 tons of highly toxic radioactive waste on Texas. We say a loud and clear NO to this plan.

Thank you

Patrice Sutton, MPH
San Francisco Bay Physicians for Social Responsibility
311 Douglass Street
San Francisco, CA 94114
Psutton2000@yahoo.com