

From: Robert Gould <rmgould1@yahoo.com>
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To: WCS_CISFEIS Resource
Subject: [External_Sender] Docket ID, NRC-2016- 0231
Attachments: 10-15-20 Texas NRC Comments -Final RGould.pdf

Dear NRC:

Attached please find a hard copy of my comments made today (October 15, 2020) during the public hearing (virtually) regarding the **WCS' Draft Environmental Impact Statement (DEIS)**.

Thank you for your attention,

Robert M. Gould, MD
President
San Francisco Bay Physicians for Social Responsibility

Federal Register Notice: 85FR27447
Comment Number: 7256

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Docket ID: NRC-2016-0231 WCS' Draft Environmental Impact Statement (DEIS)

My name is Dr. Robert M. Gould, MD. After working as a Pathologist for over 30 years at Kaiser Hospital in San Jose, since 2012 I've been an Associate Adjunct Professor in the Program on Reproductive Health and the Environment at the UCSF School of Medicine. Since 1993, I've been on the National Board of Physicians for Social Responsibility (PSR), serving twice as President in 2003 and 2014. Since 1989 I've also been President of the San Francisco Bay Area Chapter of PSR, for which I'm speaking today, and I'd like to express my complete support of the comments offered earlier by my PSR colleagues Patrice Sutton and Dr. Elliot Trester.

Representing hundreds of health professionals, we want to register our strong opposition to the proposal of Waste Control Specialists/Interim Storage Partners to bring in 40,000 metric tons of irradiated ('spent') nuclear fuel from across the US to Texas through thousands of shipments over 20 years, for a purported 40 years of on-site storage. We find that the proposed Environmental Impact Statement fails to address significant public and environmental health issues, and we call on the NRC to reject the license of the proposed facility.

We have major concerns about the implicit sleight-of-hand in promoting a concept of "interim storage" that ignores its apparent illegality under federal law whereby no such temporary storage site is to be built or used in the absence of a permanent repository for our nation's waste. Given ongoing major problems associated with the development and approval of the Yucca Mountain permanent repository because of its own considerable environmental and public health problems, we believe that the assumption that the Texas site would only be operational for 40 years is faulty, and instead would in reality open the door for inadequate storage of highly dangerous radioactive waste indefinitely.

We are particularly concerned because the proposed site is in a geographic region which according to overwhelming scientific consensus, will be severely challenged by unfolding impacts of global warming, with consequent threats of contamination to air, water, soil and the entire ecosystem. As such, we note that a Texas Commission on Environmental Quality technical team that had previously evaluated the neighboring waste site Waste Control Specialists Texas had unanimously recommended against placing high level radioactive waste there because water resources could not be protected, a concern we believe applicable to the current proposal, particularly because of its close-enough geographic proximity to the Ogallala Aquifer.

We think that the assurances offered in the EIS about isolation from water sources are overly optimistic, with so many uncertainties surfacing about the course and rate of our climate emergency, and we support earlier testimony today to allow outside, independent expert review of the current and future integrity of regional water sources expected as climate change progresses, in addition to other concerns also raised earlier today regarding expected extremes in temperature that would presumably negatively impact storage integrity.

We also support those who have testified about the inappropriate exclusion of a number of safety issues germane to the overall plan, including potential for radioactive releases during transport and storage. As such we want to register our concerns about idealized assumptions around the safety of packaging and transferring high-level across the country, given that an estimated significant portion of waste will be derived from "high burnup" spent fuel that has greater

radioactivity and related decay heat that can lead to the cladding becoming brittle, or to become thinned or elongated with resultant potential for failure from handling and transport of wastes, or prolonged storage within “dry casks” more applicable for temporary storage.

As such we believe the EIS is inadequate regarding anticipating that canisters being received will be intact and not requiring re-containerization over the anticipated decades of storage at the WCP/ICP site, with no clear guidelines laying out criteria for repackaging, and no apparent requirements requiring a committed wet or dry transfer facility to allow transfer to new containers when needed. As well, we would want the EIS to directly address the potential environmental risks posed by possible return to waste generators of canisters received in damaged or otherwise unacceptable conditions, whereby such transport could provide additional dangers to communities along transport routes. Particularly because of issues raised about train derailments in this morning’s testimony, we support calls for NRC to hold additional face-to-face meetings with communities along all proposed transport corridors, and to lengthen the comment period until six months after our current COVID crisis abates to facilitate maximum public input.

In conclusion, we believe that this plan, as with others calling for “so-called” interim storage ignores the immense danger of continuing the nuclear energy industry going in light of better alternatives for our climate crisis, given the continued generation of highly radioactive waste, while we have failed as a society to safely store the massive tonnage of lethal waste generated to date in the absence of any truly thoughtful and environmentally protective plan for a permanent storage site that would avoid the pitfalls of the Yucca Mountain siting and design.

Until we as a society clearly confront our need to deal more thoughtfully with these immense and dangerous problems we have inherited and continue to propagate, we face continued distraction by projects such as this which hide the real scope of our problems, while insulating the generators of the waste from the profound health and fiscal consequences of their operations. Instead, the true, aggregate costs are projected on the public at large, and particularly the many very disadvantaged communities either put in danger along transport routes or at final designated “temporary” sites that will most likely persist in perpetuity, posing immense hazards for all future generations. Because of such ominous consequences, we strongly support the call for a “No Action” alternative.