From: Joy Sullivan <lightjoy@ptd.net>
Sent: Friday, October 30, 2020 9:35 AM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Draft Environmental Impact Statement (DEIS), Docket No. 72-1050; NRC-2016-0231

Dear Nuclear Regulatory Commission (TX CIS),

To the NRC:

The NRC has not adequately considered the environmental impacts of transporting nuclear waste to and from the proposed Interim Storage Partners (ISP) high level waste storage site in Texas--neither in the cask certification processes nor this draft environmental impact statement. This shortfall is even worse for hotter "high burn up" irradiated fuel which was not considered in most analyses.

Thousands of intensely radioactive shipments, over decades, would travel through most of the states, a vast majority of Congressional districts, mostly by train but also by road and barge on vital waterways. The impacts are not "small." The reports used to make this conclusion are wrong and must be replaced. They underestimate the probability of serious accidents especially for rail freight and fires.

Fires could cause cask lid bolts to stretch. Radioactive gases and particulates could get out via valves or a fire lasting longer than the mere half-hour and burning hotter than 1475 degrees Fahrenheit design bases. These and other scenarios could cause cask failure and radioactive releases.

Many transport fires have burned longer than the 1/2-hour or 3 hours NRC considers in its analysis. There are increasing numbers of tankers with flammable chemicals on the rails increasing the likelihood of high-temperature fires.

The draft environmental impact statement (DEIS) fails to adequately assess the environmental impacts of the containers that would be used to transport and store the waste. NRC staff have stated that cask concerns must be addressed when the NRC certifies the casks, but the communities through which the shipments would move and those in the vicinity of the proposed waste storage site have not had the chance to participate in the cask certifications due to timing, lack of notification, and lack of opportunity to engage in an adjudicatory way.

There are 6 dry storage systems , including 16 kinds of canisters proposed for the ISP site. The environmental impacts of each of these have not been fully analyzed. The safety analysis in the certification and the report used for this DEIS are inadequate as they do not require the container to meet real world conditions including the length of time and the temperature of fires, the length of time and depth of immersion in water, and collisions at normal highway and rail speeds. Environmental impacts were not considered in the certifications of the cask designs. The cask certification process is not reasonably accessible for public participation.

The radiation risk numbers NRC uses do not take into account that more females and youths get cancer than adult men from the same amount of radiation. Only cancer and severe birth defects are estimated--No evaluation of other known radiation effects including reduced immunity, autoimmune diseases and heart/cardiovascular disease are considered.

I object to these unnecessary risks and ask NRC to reject the ISP license application.

Sincerely,
Joy Sullivan
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Newton, NJ 07860

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