From:	TB <tbscpbsc@satx.rr.com></tbscpbsc@satx.rr.com>
Sent:	Sunday, November 1, 2020 7:06 PM
То:	WCS_CISFEIS Resource
Subject:	[External_Sender] Reference Docket ID NRC-2016-0231 Comments

I write for the nearly 3000 members of the Alamo Group of the Lone Star Chapter of the Sierra Club. Our group does **NOT CONSENT** to transport of thousands of casks of high level radioactive waste (HLRW), by train and/or truck, through our San Antonio, Texas region.

The WCS EIS is woefully inadequate. Transportation risk assessment is limited to only the local area around WCS itself. Rail and highway routes run through downtown areas of major cities across America. Spanish speaking, low income minority neighborhoods are located within close range of many of these routes, including here in San Antonio. NRC outreach to inform these communities of these proposals has been close to nonexistent. Internet access is limited in many of these communities here and across the country, and yet these hearings are being conducted entirely on line. NRC risk standards for cask breakage are a 30 foot fall, which is less than many highway and rail overpasses. Fire risk is limited to 30 minutes. Well documented rail and highway accident related fires have taken longer than that to extinguish. Radiation exposures are limited to short times on the assumption that the vehicles--rail cars or trucks--are in motion. However, trains are often delayed for many hours in downtown railroad exchange yards. Trucks and adjacent passenger vehicles are often delayed for hours in major highway accidents.

The risks from this "Interim" Storage proposal to citizens of our region are real, substantial and unacceptable. There is no logic in "interim storage". Permanent storage is required and "interim" storage will only delay a permanent solution, double transport risks and multiply costs.

Our city and county governments are on record in opposition to this plan, as is our Governor.

We in San Antonio do not consent, and CANNOT consent for our descendents several generations removed, to have this unnecessary decades long transport of extremely dangerous HLRW through our community. **We support the NO ACTION** alternative.

This waste must remain isolated for a million years. Storing it for decades above ground in extreme climate conditions does not lead the nation toward this goal. The NRC should halt review of the WCS license application for Consolidated Interim Storage in Texas, as well as review of the Holtec project proposed for nearby New Mexico. In the interest of our public health and safety both licenses should be denied. We need PERMANENT STORAGE, and an end to further HLRW production.

Sincerely,

Terry Burns, M.D. Chair, Alamo Group, Lone Star Chapter, Sierra Club tbscpbsc@satx.rr.com 210.375.4735

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