

From: johnewilksiii@windstream.net
Sent: Sunday, November 1, 2020 6:13 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Petition to ASLBP-Interim Waste Storage Permit Application-DOC# NRC-2016-0231
Attachments: nrcwastecontrol.doc

Kindly find my attached petition.

Federal Register Notice: 85FR27447
Comment Number: 9084

Mail Envelope Properties (497622298.147037028.1604272393041.JavaMail.zimbra)

Subject: [External_Sender] Petition to ASLBP-Interim Waste Storage Permit
Application-DOC# NRC-2016-0231
Sent Date: 11/1/2020 6:13:13 PM
Received Date: 11/1/2020 6:13:15 PM
From: johnewilksiii@windstream.net

Created By: johnewilksiii@windstream.net

Recipients:

Post Office: windstream.net

Files	Size	Date & Time
MESSAGE nrcwastecontrol.doc	33 27830	11/1/2020 6:13:15 PM

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

John E. Wilks, III
Chair, Environmental Committee
Veterans For Peace, Chapter #63 (ABQ)
1115 Republic Road
Winston, NM 87943

November 1, 2020

SUBMITTED BY EMAIL
"WCS_ISF_EIS@nrc.gov"

Nuclear Regulatory Commission
Atomic Safety and Licensing Board Panel (ASLBP)
Washington, D. C. 20555-0001

Re: Application for a 40 Year Permit Filed by Waste Control Specialist (WCS) / Interim Storage Partners LLC(ISP), to Store 40,000 Metric Tons of High Level Nuclear Wastes in Andrews County, Texas (Docket ID NRC-2016-0231)

Dear Panel Members:

This petition is timely electrically filed during the public comment filing period ending November 3, 2020.

Veterans For Peace, Chapter #63, urges denial of the pending permit application.

There are many reasons for you to not grant this permit. Central to our argument is a contention that consolidated interim storage is not statutorily provided for in the Nuclear Waste Policy Act. Further, we disagree with the finding contained in the NRC's report which recommends the approval for radioactive waste be to transported across Texas and stored in Andrews County. Rather, we believe the safety concerns raised in 2014 by the Texas Commission on Environmental Quality (TCEQ) regarding the movement along transportation routes (inter-modal) through Texas and to the site warrant disapproval of the permit. We also contend that granting the permit would pose inherent unacceptable environmental risks owing to the proposed storage sites' close proximity to the Ogallala Aquifer (fresh water) and the Permian Basin (fossil fuels).

Geographically, the Andrew site would be only a few miles from to the shared state borders of Texas and New Mexico. Nevertheless, we acknowledge that the state governors of Texas and New Mexico may have a limited role in the Board's decision, as this is a federal matter. Nevertheless, it is significant to note that both governors in October 2020 publicly reiterated their opposition to the establishment, in their states, of interim storage sites for high level nuclear wastes.

The NRC may seek to resolve a longstanding, nationally problem by granting this permit. The NRC has conducted an Agency Study, reviewed the Environmental Impact Statement (DRAFT), received the public's virtual comments and testimony, reviewed the permit application, and deliberated. We understand that between 78,000 an 100,000 metric tons of high level waste have accumulated and continue to accumulate at the nation's nuclear power generating plants and thirty-five other sites within the NRC's regulatory jurisdiction. With the elimination of Yucca Flats, Nevada as a permanent storage site in Yucca Flats,

Nevada, a timely decision on this matter and resolution of this problem is highly desired, if not imperative. Yet, we urge the Board to foreclose the risk of transporting high level waste twice—once to any interim storage site, then again, years later, to a permanent national storage site. We contend that continued storage *in situ* may not be the least expensive course of action for the waste generators and rate payers, but is it clearly the safest option for not only the public along transportation routes and at the storage site, but also the environment.

Veterans for Peace (Chapter #63-Albuquerque) urges the Board to deny the permit for interim storage of high level nuclear waste in Andrews, Texas.

Respectfully,

John E. Wilks, III
Committee Chair