

**From:** McCULLUM, Rodney <rxm@nei.org>  
**Sent:** Monday, November 2, 2020 1:50 PM  
**To:** WCS\_CISFEIS Resource  
**Cc:** Kock, Andrea; Lubinski, John; Vietti-Cook, Annette  
**Subject:** [External\_Sender] NEI Comments on the Interim Storage Partners Consolidated Interim Storage Facility Project Draft Environmental Impact Statement, 85 Federal Register 27, 447, May 8, 2020  
**Attachments:** 11-02-20\_NRC NEI Comments On Draft ISP EIS FINAL.pdf

**THE ATTACHMENT CONTAINS THE COMPLETE CONTENTS OF THE LETTER**

November 2, 2020

Office of Administration  
Mail Stop: TWFN-7-A60M  
ATTN: Program Management, Announcements and Editing Staff  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** NEI Comments on the Interim Storage Partners Consolidated Interim Storage Facility Project Draft Environmental Impact Statement, 85 Federal Register 27,447, May 8, 2020

**Docket No. 72-1050; NRC-2016-0231**  
**Project Number: 689**

Dear Program Management, Announcements and Editing Staff:

The Nuclear Energy Institute (NEI)<sup>[1]</sup> is pleased to provide comments to the Nuclear Regulatory Commission regarding the subject Draft Environmental Impact Statement (DEIS) for Interim Storage Partners Consolidated Interim Storage Facility (CIS) Project. NEI has a longstanding policy of supporting the development of a consolidated spent nuclear fuel storage facility in parallel with completion of the Nuclear Regulatory Commission's (NRC) review of the Yucca Mountain repository license application. The purpose and need of this project are straightforward: to provide a safe, retrievable storage facility where nuclear materials currently stored at numerous installations across the country can be consolidated in preparation for future relocation to a final repository.

---

<sup>[1]</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

Responsible, well-planned consolidated interim storage of used nuclear fuel – as proposed by this project – fits firmly into what Congress had in mind when, in enacting NEPA, it sought the balance of “enjoyable harmony between man and his environment.” Accordingly, we believe that this project is in the long-term best interest of the United States, the State of Texas, Andrews County, and the communities from where currently stored spent fuel will be removed. As such, it is an important U.S. infrastructure project that requires predictable licensing, and therefore we urge you to finalize this EIS without further delay.

Sincerely,  
Rodney McCullum  
Senior Director,  
Decommissioning & Used Fuel

Nuclear Energy Institute  
1201 F St NW, Suite 1100  
Washington, DC 20004  
[www.nei.org](http://www.nei.org)

P: 202.739.8082  
M: 202.384.0240  
E: [rxm@nei.org](mailto:rxm@nei.org)

---

*This electronic message transmission contains information from the Nuclear Energy Institute, Inc. The information is intended solely for the use of the addressee and its use by any other person is not authorized. If you are not the intended recipient, you have received this communication in error, and any review, use, disclosure, copying or distribution of the contents of this communication is strictly prohibited. If you have received this electronic transmission in error, please notify the sender immediately by telephone or by electronic mail and permanently delete the original message. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.*

---

Sent through [www.intermedia.com](http://www.intermedia.com)

**Federal Register Notice:** 85FR27447  
**Comment Number:** 9901

**Mail Envelope Properties** (716b91c5c9a64d87a2f78d52e41eb779)

**Subject:** [External\_Sender] NEI Comments on the Interim Storage Partners Consolidated Interim Storage Facility Project Draft Environmental Impact Statement, 85 Federal Register 27, 447, May 8, 2020

**Sent Date:** 11/2/2020 1:50:15 PM

**Received Date:** 11/2/2020 1:50:20 PM

**From:** McCULLUM, Rodney

**Created By:** rxm@nei.org

**Recipients:**

**Post Office:** nei.org

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3944	11/2/2020 1:50:20 PM
11-02-20_NRC NEI Comments On Draft ISP EIS FINAL.pdf		113851

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

**ROD MCCULLUM**

*Sr. Director, Decommissioning and Used Fuel*

1201 F Street, NW, Suite 1100  
Washington, DC 20004  
P: 202.739.8082  
rxm@nei.org  
nei.org



November 2, 2020

Office of Administration  
Mail Stop: TWFN-7-A60M  
ATTN: Program Management, Announcements and Editing Staff  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** NEI Comments on the Interim Storage Partners Consolidated Interim Storage Facility Project Draft Environmental Impact Statement, 85 Federal Register 27,447, May 8, 2020

**Docket No. 72-1050; NRC-2016-0231**  
**Project Number: 689**

Dear Program Management, Announcements and Editing Staff:

The Nuclear Energy Institute (NEI)<sup>1</sup> is pleased to provide comments to the Nuclear Regulatory Commission regarding the subject Draft Environmental Impact Statement (DEIS) for Interim Storage Partners Consolidated Interim Storage Facility (CIS) Project. NEI has a longstanding policy of supporting the development of a consolidated spent nuclear fuel storage facility in parallel with completion of the Nuclear Regulatory Commission's (NRC) review of the Yucca Mountain repository license application. The purpose and need of this project are straightforward: to provide a safe, retrievable storage facility where nuclear materials currently stored at numerous installations across the country can be consolidated in preparation for future relocation to a final repository.

Consolidation of the nation's spent fuel for temporary storage is a common-sense step forward for the nation's used fuel management program. While spent fuel can be safely maintained where it is now, the increased cost of keeping it stored at 73 different locations is ultimately paid for by the American taxpayer, and consolidation will reduce costs. At one location we can consolidate security and operations, and we can also optimize inspection and maintenance of the storage systems.

---

<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

In preparing the DEIS, the NRC has satisfied its obligations under the National Environmental Policy Act (NEPA) in a fair, thorough, and timely manner. NRC staff's recommendation that the analysis in this DEIS supports the issuance of a license to Interim Storage Partners to construct and operate the proposed CIS facility comports with what has been learned from industry's 34 years of experience operating similar storage facilities at 73 locations in 34 states. The environmental impacts associated with dry cask storage of used nuclear fuel using the same technologies being planned at this facility have indeed been demonstrated to be small.

Similarly, the evaluation of transportation in the DEIS is sound and well supported by the numerous transportation risk studies conducted over the years as well as the bounding analysis in NRC's Yucca Mountain Environmental Impact Statement. These studies are appropriately cited in the DEIS and backed by the experience of more than 1,300 spent fuel shipments that have been completed safely in the United States over the past 35 years. Worldwide, there have been at least 20,000 safe shipments of more than 80,000 metric tons of spent nuclear fuel (SNF). NRC is correct in concluding that "All of the estimated public health effects from the proposed incident-free SNF transportation during the operations stage of the proposed action (Phase 1) and the operations stage of phases 2-8 are low (most likely to be zero)"<sup>2</sup>. NRC has also appropriately relied on its long history of robust and conservative transportation risk assessments to conclude that "releases of SNF would not be expected from the proposed SNF shipments under accident conditions."<sup>3</sup>

There are two other aspects of the DEIS that are particularly notable.

- First, NRC staff's comparison of the proposed CIS facility costs to the costs of the No-Action alternative – which would leave spent fuel to be managed at 73 sites across the country even after reactors have shut down and been otherwise decommissioned – shows that in all cases the No-Action alternative costs exceed the proposed action costs resulting in a net benefit for the proposed CIS facility.<sup>4</sup>
- Second, NRC staff's socioeconomic analysis of the proposed action finds that the impacts resulting from construction of the proposed CIS facility "would be SMALL for employment, housing, and public services and MODERATE and beneficial for local finance."<sup>5</sup>

In reaching these two findings, the DEIS demonstrates that the proposed facility is in the public interest both to the local community that will receive the direct economic benefits, and to taxpayers nationwide who would no longer be burdened with the higher costs of the No-Action alternative. For shutdown reactor sites, the proposed CIS facility will have the additional benefit of allowing communities to redevelop areas that can be reclaimed once spent fuel currently stored there is removed.

During the public comment period, concerns were expressed over the impact of the operation of the proposed facility on the health of the oil and gas industry in the Permian Basin. NRC should fully respond to

---

<sup>2</sup> Executive Summary, page xxiii of the DEIS

<sup>3</sup> Executive Summary, pages xxiii and xxiv of the DEIS

<sup>4</sup> Executive Summary, page xxxviii of the DEIS

<sup>5</sup> Executive Summary, page xxii of the DEIS

these concerns. In doing so, the agency should recognize that there are numerous locations in the United States where oil and gas and nuclear infrastructure successfully coexist. For example, the Calvert Cliffs interim spent fuel storage facility on the Chesapeake Bay in Maryland is located just three miles from the Cove Point Marine Terminal, one of the largest LNG liquefaction and export facilities in the nation, with large natural gas pipelines that traverse within a half mile of the spent fuel storage facility. The Cove Point LNG terminal is a thriving port with LNG tankers docking, loading and departing every few days and where 770 million cubic feet of natural gas are processed every day. When the Calvert Cliffs interim spent fuel storage facility was proposed, constructed and later expanded, the owner of the Cove Point terminal and the pipeline operator never expressed a concern over the proximity of the spent fuel storage facility and they have experienced no adverse effect on operations since.

We commend NRC for taking a safe and responsible approach for receiving public comments during the ongoing COVID-19 pandemic. By extending the public comment period to six months and conducting four public meetings during which numerous participants offered comments by phone, NRC has provided ample opportunity for public input during a time when conducting face-to-face meetings would not have been advisable.

Responsible, well-planned consolidated interim storage of used nuclear fuel – as proposed by this project – fits firmly into what Congress had in mind when, in enacting NEPA, it sought the balance of “enjoyable harmony between man and his environment.” Accordingly, we believe that this project is in the long-term best interest of the United States, the State of Texas, Andrews County, and the communities from where currently stored spent fuel will be removed. As such, it is an important U.S. infrastructure project that requires predictable licensing, and therefore we urge you to finalize this EIS without further delay.

Sincerely,



Rod McCullum

c: Andrea Kock, NRC/NMSS/DFM  
John Lubinski, NRC/NMSS  
Annette L. Vietti-Cook