

From: Arifa Goodman (goodkaz@newmexico.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Monday, November 2, 2020 5:57 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Docket ID NRC-2016-0231: Please deny the WCS storage site in Texas

Dear Nuclear Regulatory Commission,

Use of this site to store the nuclear waste from reactor cores is illegal since it isn't designed to be a permanent repository of hot nuclear waste. Do not allow this illegal use of radioactive dumping in New Mexico. New Mexicans are opposed to the hazardous hauling of radioactive materials through our state. The potential for highly lethal accidents is too great and the unknown risks are even greater. This proposal seems to be just thrown together without any forethought or adequate assessment.

The WCS permit for an interim consolidated storage site should be denied. The ISP Draft Environmental Impact Statement is misleading, incomplete and denies or ignores reality. It:

--Fails to assess the additional risk to the country that one or more CIS sites will cause. Not all waste will be moved from all nuclear power reactors sites to ISP/WCS (or to the Holtec site proposed nearby) thus the CIS sites are ADDITIONAL sites requiring massive transport risks, with no guarantee that the sites sending the waste will really be cleaned up.

--Incorrectly assumes only 40 years of storage even though the waste could be at the site far longer than that, potentially indefinitely. The DEIS incorrectly assumes there will be a permanent repository elsewhere, despite the only proposed permanent repository at Yucca Mountain having been rightly cancelled in 2010. The ISP/WCS application does not provide protections for long term or permanent isolation and the DEIS ignores this. The more-likely reality?i.e., that the waste will be at the site for much longer than the 40-year license period?is not addressed in the DEIS. This puts the air, water, soil and ecosystem at long term risk from radioactivity.

--Incorrectly assumes all waste and containers that arrive will be intact and waste will not need to be re-containerized for the decades it will remain at the WCS ISP site. The DEIS fails to address what happens when waste must be repackaged. The application and the DEIS should require a wet or dry transfer facility to shield the intense radioactivity so it can be repaired or transferred to new containers. Workers, passers-by and the environs could receive massive, potentially lethal, gamma doses in that scenario--yet no assessment is provided in the DEIS.

--Fails to address the environmental impacts of returning damaged containers of high-level radioactive waste if they arrive in unacceptable condition. ISP's plan is to "return to sender" with no analysis of the logically higher risk of transporting failed fuel and/or containers twice.

--Ignores potential higher risks from damaged fuel and high burnup fuel.

--Fails to acknowledge or respect the institutional racism in selecting the ISP WCS site in West Texas.

--Fails to acknowledge impacts on all transport routes to the site. I call on NRC to hold in-person DEIS meetings all along the potential routes and to extend the comment period until six months after the COVID-19 crisis ends.

WCS_CISF_EIS@nrc.gov

Sincerely,

Arifa Goodman
PO Box 66
San Cristobal, NM 87564
goodkaz@newmexico.com
(575) 776-9807

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Rio Grande Sierra Club at Sierra Club at riogrande.chapter@sierraclub.org or (415) 977-5500.

Federal Register Notice: 85FR27447
Comment Number: 9967

Mail Envelope Properties (M10ndtyAQu25emu7k_YQHw)

Subject: [External_Sender] Docket ID NRC-2016-0231: Please deny the WCS storage site in Texas
Sent Date: 11/2/2020 5:56:44 PM
Received Date: 11/2/2020 5:56:48 PM
From: Arifa Goodman (goodkaz@newmexico.com) Sent You a Personal Message

Created By: automail@knowwho.com

Recipients:

Post Office: ismtpd0138p1mdw1.sendgrid.net

Files	Size	Date & Time
MESSAGE	3421	11/2/2020 5:56:48 PM

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