

From: Joni Arends <info@sg.actionnetwork.org>
Sent: Tuesday, November 3, 2020 11:35 AM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Halt the ISP application for "interim" radioactive waste storage

office of administration,

Office of Administration

Mail Stop: TWFN-7-A60M

Attn: Program Management, Announcements and Editing Staff

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

RE: Draft Environmental Impact Statement (DEIS), Docket No. 72-1050; NRC-2016-0231 Interim Storage Project's license application to construct and operate a Consolidated Interim Storage Facility (CISF) for spent nuclear fuel (SNF) and Greater-Than Class C (GTCC) waste.

Dear NRC Commissioners and Staff,

Interim Storage Project's (ISP) application would lead to the import and "interim" storage of 40,000 tons of commercial spent nuclear fuel from nuclear reactors around the country in Andrews County, Texas, for 40 years, or perhaps forever.

ISP is proposing an environmentally unjust plan and would target a largely Latinx region of the country with the deadliest nuclear waste. The region is unsuitable for storing nuclear waste since it is prone to earthquakes, sinkholes (e.g., the sinkhole in Carlsbad, NM), temperature extremes, wildfires, intense storms and flooding.

Nationwide, this plan would jeopardize the health and safety of millions of people unnecessarily due to risks from potential leaks, sabotage or transportation accidents.

Consolidated interim storage is an illegal band-aid approach to radioactive waste problems that fails to get the waste into permanent disposal for long-term isolation.

The NRC has ignored many key health and safety issues raised in thousands of previous comments and in 100 legal contentions, many of which were backed by expert testimony. The inadequate Draft Environmental Impact Statement (DEIS) shows that the NRC has ignored these concerns.

There would be no way to repackage radioactive waste from a cracked or leaking canister, and no way to move it anywhere as a result. As a result, neighbors, travelers, emergency responders, and others would be exposed FOREVER. Those exposures are not accounted for in the DEIS. No hot cell is proposed, which should be mandatory for this type of facility.

Threats from terrorism are not adequately addressed and the potential attacks by drones was not considered. The DEIS is inadequate because it ignores the question about the consequences and harms that would result should the waste go critical. Further, Hardened Onsite Storage Systems (HOSS) was not considered as an alternative to consolidated interim storage, an irresponsible and glaring omission on the part of NRC.

The irresponsibility of the NRC continues with the DEIS not designating the transportation routes that would be used. As a result, the accident risks have been artificially minimized.

In contrast, the State of Nevada Yucca Mountain studies found that a single small transportation accident could permanently contaminate 42 square miles of land. Radioactive Waste Management Associates (RWMA) found that 1370 latent cancer fatalities could result from a rail accident with spent nuclear fuel, with costs of \$145 - \$270 billion for a severe accident. The DEIS blatantly ignores available scientific data of the transportation risks. Further, NRC wrongly minimizes the transportation risks.

The DEIS fails to adequately analyze cumulative impacts of the proposed ISP facility and

those potential impacts from nearby nuclear sites, e.g., Lea County Landfill, International Isotopes, the Waste Isolation Pilot Plant (WIPP), the proposed Holtec consolidated interim storage facility, and oil and gas operations in the Permian Basin (naturally occurring radioactive materials (NORM)). The DEIS fails workers, local people, emergency workers, businesses, including oil and gas, and the environment.

Natural disasters or an accident could create cumulative impacts. A fire and a subsequent radiation release at the nearby WIPP site in February 2014 cost at least \$2 billion to remediate. The DEIS fails to address these events.

The DEIS fails to analyze impacts of potential groundwater contamination that could damage the viability of the storage pad, which must be able to support extremely heavy casks and canisters.

The risks of creating a dangerous de facto permanent site interim were not included, although Former NRC Chairman Gregory Jaczko has said that a consolidated interim storage facility should be viewed as a permanent facility. Nuclear waste should not be moved across the country to a site not designed for permanent disposal. NRC is ignoring its responsibilities to follow the requirements of the 1982 Nuclear Waste Policy Act (NWPA).

This nation must end environmental injustice, environmental racism, and halt the disproportionate impacts of the proposed activities on people of color. Dumping the most toxic nuclear waste of a whole nation on the largely Latinx Southwest region is the height of environmental injustice and environmental racism.

NRC must meet its legal and regulatory responsibilities in order to protect the land, air and water, wildlife, plant life and aquifers of this region and through a moving 50-mile radius along the transport routes. Businesses at risk include small businesses, pecan growers and other agricultural businesses, the ranching and dairy industries, and the oil and gas industry.

I oppose proposed ISP consolidated interim storage facilities at this, and other sites. The

DEIS fails to adequately analyze environmental and cumulative impacts and the socioeconomic risks of the proposed radioactive waste storage application as required by the National Environmental Policy Act (NEPA).

The NRC is required protect public health and safety, the economy and the environment. Given the NRC's failure to prepare a DEIS that meets NEPA requirements, NRC must halt the application process and deny the license for the proposed ISP consolidated interim storage facility.

Thank you for your careful consideration of my comments.

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