

From: Kevin Kamps <kevin@beyondnuclear.org>
Sent: Tuesday, November 3, 2020 12:11 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Beyond Nuclear's 24th set of public comments, re: Docket ID NRC-2016-0231, and report number NUREG-2239, NRC's ISP/WCS CISF DEIS, re: Beyond Nuclear comments recorded at an NISG Zoom "People's Hearing" on Sept. 16, 2020, and adapted f...

Submitted via: <WCS_CISF_EIS@nrc.gov>

Dear NRC Staff,

We submit these comments on behalf of our members and supporters, not only in New Mexico and Texas, near the targeted ISP/WCS CISF site, but across both of these states, and the rest of the country, along road, rail, and waterway routes that would be used for high risk, highly radioactive waste shipments to ISP/WCS's CISF, as well as to Yucca Mountain, Nevada, on Western Shoshone land -- wrongly and illegally assumed by ISP/WCS, as well as by NRC, to someday (or some decade, or some century) become a permanent disposal repository. This unnecessarily repeated, multiple legged, cross-continental transport of highly radioactive waste, is another significant aspect of the EJ (Environmental Justice) burden associated with this ISP/WCS CISF scheme.

The following subject matter has gotten little to no attention in NRC's ISP/WCS CISF DEIS, a far cry from NEPA's legally binding "hard look" requirement:

Beyond Nuclear comments recorded at an NISG Zoom "People's Hearing" on Sept. 16, 2020, and adapted for use as comments in this ISP/WCS CISF DEIS proceeding

These comments are adapted from comments submitted in the Holtec/ELEA CISF DEIS proceeding. On Sept. 16, 2020, Beyond Nuclear's radioactive waste specialist, Kevin Kamps, took part in a Nuclear Issues Study Group "People's Hearing" Zoom. Kevin's verbal comments were then transcribed by NISG and submitted to NRC. The comments below have been adapted for use in this ISP/WCS CISF DEIS proceeding.

The following comments were transcribed from the video recording of the People's Hearing held by the Nuclear Issues Study Group on Wednesday, September 16, 2020 (Available online: <https://www.youtube.com/watch?v=CfCBsXCQyOU>). These written comments are being submitted with the consent of the commenters. The transcription was made possible by the work of the Nuclear Issues Study Group volunteers.

Comment sent on behalf of:

BEYOND NUCLEAR

I serve as Radioactive Waste Specialist at Beyond Nuclear and I'm also on the board of Don't Waste Michigan and on the Advisory Board of Citizens for Alternatives to Chemical Contamination. Those latter two are Michigan-based groups, and I just wanted to mention all three because we're official legal interveners in the rigged NRC licensing process.

Now that the NRC is poised to entirely kicked us out of the ISP/WCS licensing proceeding, we will soon be, all of our groups and others, you know, allied with NISG, in the second highest court in the land, the U.S. Court of Appeals for the District of Columbia Circuit.

And one of the ideas that Libbe HaLevy of Nuclear Hot Seat has shared, and others, that it's illegal, what they're proposing here in this proceeding should never have started.

That is one argument, but there are dozens more that were brought by Terry Lodge on behalf of a coalition and by Wally Taylor on behalf of Sierra Club which is the biggest and oldest environmental group in the country.

So, we'll see what happens in court.

I've got my Don't Waste Michigan hat on for these comments today.

I'm from Kalamazoo, Michigan, which is Potawatomi land, and we have three nuclear power plants on the Lake Michigan shoreline in Michigan.

We've got Palisades, and Cook units 1 and 2 in Southwest Michigan on Potawatomi land, and Big Rock Point up north on Odawa land.

Fortunately, Big Rock Point is shut down, but they still have the high level radioactive waste there, but Palisades and Cook are still operating, making more high level radioactive waste every year.

And so in NEPA-speak, National Environmental Policy Act, I'd like to say that the preferred alternative to the ISP/WCS CISF is to stop making it.

Stop making irradiated nuclear fuel.

We've made that call for a long time, and more and more people are joining us in that.

So imagine the two years left that Palisades supposedly has—I don't believe them—they lied about shutting down in 2018, and now they are saying they are going to shut down in 2022, but imagine the years of waste they would not generate.

Cook, two giant units is not planning to operate for years more, they are planning to operate for decades more.

So imagine the waste that would not exist if they just shut down.

We don't need them.

We have enough electricity already.

If more is needed, it can be provided by renewables and efficiency.

Those are the preferred alternatives.

Also speaking on behalf of Don't Waste Michigan, I want to say that: we do not consent to ISP/WCS's CISF.

We do not consent.

And we did have to fight this fight in Michigan.

There were folks who said, "Get it out of here, we don't care where it goes, we don't care how it gets there."

We did have to fight this fight over years, but in the end there was a consensus reached and it included folks like Ian Zabarte from the Western Shoshone coming to Michigan, coming to Don't Waste Michigan meetings, meeting people, explaining about being targeted with the national dump site down there in Nevada, and we reached consensus.

We can't dump our problems on other people.

But having said that, it's a dilemma, because right now all that waste is very near the water of Lake Michigan.

The problems that San Onofre faces, we have been facing in West Michigan for a quarter century, or more than that actually, and right now we have historic high Lake Michigan water levels with severe erosion including very close to the Palisades independent spent fuel storage installation.

I was just out there in April and again in August, and it's the highest I've ever seen and I have visited that site for 30 years.

It was 30 paces from the water's edge to the bluff which is about a hundred feet, and just over that small sand dune is the high level radioactive waste.

So all it's going to take is a severe storm or an earthquake, because the dry cask storage at Palisades is on a sand dune.

It's 55 feet of loose sand underneath, anchored to nothing, and an earthquake could simply open the sand and let the lake flow in, and the waste could fall in the lake.

As explained further below, this could radioactively ruin the drinking water supply for 40 million people downstream.

So we have real problems, but our preferred alternative to CISFs is Hardened On-Site Storage, which is endorsed by 200+ groups across the country from all 50 states, and if that's not safe on site, then as near to the site as possible, and safe or as safely possible, so further inland, to higher ground and fortified against natural disasters, against accidents, against attacks, and the same applies at other places like San Onofre or Prairie Island, Minnesota, which is the Prairie Island Indian Community, one of the worst of these unsuitable sites.

And just the final thing I'll talk about is transportation that others have raised.

We do not consent to the risks of heavy haul trucks or legal weight trucks or rail shipments through Michigan to rush the waste out of the state to a place like ISP, just multiplying transportation risks because it would have to move again.

And it's not going to Yucca, so we don't know where it would go.

It would probably just get stuck in Texas. 0.37 miles from New Mexico.

But I would like to emphasize the barge shipments on Lake Michigan that are potential, if a single barge were to sink and release even a fraction of its contents into Lake Michigan, Lake Michigan is one of the headwaters of the Great Lakes.

Forty million people, four-zero million people in this generation alone depend on the Great Lakes for drinking water, for fisheries, for recreation, for industry.

It's one of the biggest bio-regional industries in the world, between the two countries, so eight states, two provinces, and a very large number of Native American First Nations.

The Great Lakes are 21% of the planet's surface freshwater, and 84% of North America's surface freshwater.

We cannot rush into these shipments like ISP would like to do, so as an interim measure we need to do Hardened On-Site or near site storage.

Thank you very much.

(Please address and rectify your woefully inadequate "hard look" under NEPA, re: this health-, safety-, and environmentally-significant, as well as legally-binding, subject matter above.

And please acknowledge your receipt of these comments, and confirm their inclusion as official public comments in the record of this docket.

Thank you.

Sincerely,

Kay Drey, President, Board of Directors, Beyond Nuclear

and

Kevin Kamps, Radioactive Waste Specialist, Beyond Nuclear)

--

Kevin Kamps
Radioactive Waste Specialist
Beyond Nuclear
7304 Carroll Avenue, #182
Takoma Park, Maryland 20912

Cell: (240) 462-3216

kevin@beyondnuclear.org
www.beyondnuclear.org

Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abolish both to safeguard our future. Beyond Nuclear advocates for an energy future that is sustainable, benign and democratic.

Federal Register Notice: 85FR27447
Comment Number: 10277

Mail Envelope Properties (CAFNCop5dLrixNMiQxjJbqU8+SP7UfQmq1VC-fsWx8kKJEzhkZg)

Subject: [External_Sender] Beyond Nuclear's 24th set of public comments, re: Docket ID NRC-2016-0231, and report number NUREG-2239, NRC's ISP/WCS CISF DEIS, re: Beyond Nuclear comments recorded at an NISG Zoom "People's Hearing" on Sept. 16, 2020, and adapted f...

Sent Date: 11/3/2020 12:11:01 PM

Received Date: 11/3/2020 12:11:18 PM

From: Kevin Kamps

Created By: kevin@beyondnuclear.org

Recipients:

Post Office: mail.gmail.com

Files	Size	Date & Time
MESSAGE	9365	11/3/2020 12:11:18 PM

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received: