

From: Richard Barish (richard.barish@gmail.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Tuesday, November 3, 2020 3:42 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,

I am dismayed and astonished that the DEIS does not even consider the environmental effects of possibility that waste could remain on the site longer than 40 years. I am 69 years old, and the issue of permanent storage of nuclear waste has been on the table my entire adult life. No solution has yet been found, and none is on horizon. Nothing is even being seriously explored at this point as far as I can tell. There is a high likelihood that any waste transferred to this site will remain there for more than 40 years. During that period, and especially after that period, it is likely that leaks will occur, but there is no plan for how to address leaks when they occur. To all appearances, it appears as if this part of west Texas/southeast New Mexico is being set up as a nuclear sacrifice zone. The DEIS is defective because of its failure to consider the environmental effect of possible leaks.

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,

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