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To: WCS_CISFEIS Resource
Subject: [External_Sender] Docket ID NRC-2016-0231, NUREG-2239, WCS/ISP Draft Environmental Impact Statement
Attachments: GRIP-PublicComments-WCS-ISP-DEIS.pdf

To NRC:

Please consider the attached comments from the Gila Resources Information Project on the WCS/ISP proposal for a consolidated interim storage facility in Andrews, TX NRC-2016-0231, NUREG-2239.

Thank you.

Allyson Siwik, Executive Director
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November 3, 2020

U.S. Nuclear Regulatory Commission
Office of Administration, Mail Stop: TWFN-7- A60M,
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Washington, DC 20555-0001.

Re: Docket ID NRC-2016-0231, NUREG-2239, WCS/ISP Draft Environmental Impact Statement

Sent via email to: [WCS CISF EIS@nrc.gov](mailto:WCS_CISF_EIS@nrc.gov)

To Nuclear Regulatory Commission:

On behalf of Gila Resources Information Project (GRIP), please accept these comments on Waste Control Specialists/Interim Storage Partners' (WCS/ISP) request for a license for a consolidated interim storage facility (CISF) for high-level, radioactive spent nuclear fuel in Andrews, Texas.

GRIP is a non-profit environmental advocacy organization based in Silver City, NM that promotes community health by protecting our environment and natural resources. We have approximately 1000 members in southern New Mexico.

Based on our review and evaluation of the Draft Environmental Impact Statement, **we oppose the Nuclear Regulatory Commission's recommendation to approve the WCS/ISP license for consolidated interim storage of high-level radioactive spent nuclear fuel (SNF). The DEIS has not adequately evaluated the range of risks of this proposal and reasonable alternatives to the proposed action.** Our specific comments are outlined below.

DEIS does not evaluate reasonable alternatives to the proposed action

We believe that the DEIS does not evaluate the full range of reasonable alternatives to the proposed action, such as Hardened On-site Storage Systems (HOSS) at nuclear power reactors that are already dealing with their SNF. This is the most cost-effective, least risky alternative

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since it would not entail transporting high-level radiative waste across the country for interim storage only to have it transported again for permanent storage. An analysis of the benefits of HOSS are articulated in a paper by Gordon Thompson of the Institute for Resource and Security Studies (“Robust Storage of Spent Nuclear Fuel: A Neglected Issue of Homeland Security” <https://www.nirs.org/2003-01-01-000000/0>) Dr. Thompson also explains why the risks of on-site reactor storage are less than away-from-reactor storage.

Additionally, the American Physical Society states in its Technical and Programmatic Assessment of Consolidated Interim Storage of Commercial Spent Nuclear Fuel (<https://www.aps.org/policy/reports/popa-reports/upload/Energy-2007-Report-InterimStorage.pdf>) reported that

“In reviewing numerous reports and research articles, we find that:

- There are ***no substantive safety or security reasons for establishing consolidated interim storage.***
- There are ***no compelling cost savings to the Federal government associated with consolidated interim storage***, so long as Yucca Mountain is not delayed well beyond its currently planned opening.
- ***There is sufficient space at all operating nuclear reactors to store all spent nuclear fuel in pools and in existing or additional dry casks that will be discharged even with plant license extensions.*** Although, some states may limit the amount of dry storage at a reactor site.

The two reports demonstrated that HOSS should be evaluated as a reasonable alternative to CISF and call into question the DEIS’s supportive conclusions of consolidated interim storage. **The DEIS should be amended to include an analysis of Hardened On-site Storage Systems and other reasonable alternatives.**

The Purpose and Need is disingenuous and should be revised

The DEIS analysis is disingenuous in its discussion and assumptions related to the timing and certainty of a permanent repository for SNF. The DEIS defines the purpose and need as “The purpose of the proposed ISP CISF is to provide an option for storing SNF, GTCC, and a 16 small quantity of MOX from nuclear power reactors before a permanent repository is available.” But it is highly uncertain if a permanent repository will ever be built. That would mean that a CISF could end up being a permanent repository. The likelihood of this result is not stated in the DEIS nor are the environmental impacts of this end result assessed. The DEIS evaluates interim storage for Phase 1 for 40 years only, yet the CISF may need to store high-level nuclear waste indefinitely if a permanent repository is not approved. The risks and impacts must be evaluated for this scenario.

WCS/ISP CISF proposal adds to the cumulative impacts from nuclear testing and storage

The DEIS does not acknowledge the cumulative impacts of CISF in New Mexico that is already a sacrifice zone for nuclear testing and storage. The downwinders in the Tularosa Basin continue to experience significant health effects due to the Trinity Test in 1945. Southeast New Mexico is

already home to the Waste Isolation Pilot Plant. The NRC is also proposing to give a license to Holtec's CISF. The DEIS does not acknowledge that the WCS/ISP proposal will add to the cumulative impacts from these past, current and proposed activities. The DEIS must be revised to adequately account for cumulative impacts.


Transportation risk was not evaluated

The DEIS does not evaluate the risk to communities along the rail transportation route proposed to be used to transport SNF to the proposed CISF. For example, potential impacts in southwest New Mexico stem from transportation of spent nuclear fuel from operating, decommissioning or decommissioned nuclear reactor facilities in Arizona and California. This high-level radioactive waste would be transported via Union Pacific Railway, passing through southern New Mexico and West Texas (Lordsburg, Deming, Sunland Park, El Paso-Juarez) and posing a risk from accidents, leaks, sabotage, and even routine transport emissions. The NRC's Draft Environmental Impact Statement does not evaluate the risk to communities along transportation routes all across the country.

The NRC staff preliminarily recommends that, *unless safety issues mandate otherwise*, the proposed license be issued. The DEIS has not done an adequate job of evaluating the safety risk of this proposal and therefore cannot approve a license for WCS/ISP.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink, reading "Allyson Siwik". The signature is written in a cursive, flowing style.

Allyson Siwik
Executive Director