From: Clay Turnbull <necnp@necnp.org>
Sent: Tuesday, November 3, 2020 9:51 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] No nuclear waste in Texas

Dear Nuclear Regulatory Commission,

Dear NRC Commissioners and Staff,

I'm writing on behalf of New England Coalition on Nuclear Pollution in Brattleboro, Vermont. When NECNP organized in 1971 we raised our concerns with the Atomic energy Commission in numerous hearings, regulatory and legal venues. Always the response from the AEC was not to be concerned, they had a plan. That plan was ineffective and has led to the situation we now face of what to do with the radioactive waste, particularly irradiated waste fuel rods.

Interim Storage Project's application to store radioactive waste in Texas would bring in 40,000 tons of spent nuclear fuel from nuclear reactors around the country.

The plan would target a Latinx community with deadly nuclear waste. Stored waste would be at risk from earthquakes, sinkholes, temperature extremes, wildfires, intense storms and flooding.

Consolidated interim storage is an illegal approach that does not solve our nuclear waste problem. With this proposal, the NRC has ignored expert testimony, local opposition, and tens of thousands of written and oral comments.

The Draft Environmental Impact Statement is deficient because it fails to:
• Account for disproportionate impacts to low-income communities of color (environmental justice communities) in the American Southwest and along transport routes.
• Details transportation routes and consider nationwide risk to millions of Americans along transport routes.
• Consider the risk of leaks, sabotage or transportation accidents.
• Include a plan to repackage leaking waste casks and a plan to move waste when required.
• Complete the required alternatives analysis by considering Hardened Onsite Storage Systems (HOSS) as an alternative to Consolidated Interim Storage.
• Consider past nuclear waste accidents that have cost hundreds of millions to billions of dollars to clean up.
• Detail cumulative impacts of the proposed facility and nearby sites on workers, local people, and the environment.
• Analyze potential for groundwater contamination.

I oppose Consolidated Interim Storage 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. The NRC should protect public health and safety, the economy and the environment, by halting the application process and denying the license for Consolidated Interim Storage.

Sincerely,

Clay Turnbull
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