

**From:** Jan Johnson <jjohnson1209@gmail.com>  
**Sent:** Tuesday, November 3, 2020 7:11 PM  
**To:** WCS\_CISFEIS Resource  
**Cc:** vpprogram@lwvdenton.org; president@lwvdenton.org  
**Subject:** [External\_Sender] Docket ID NRC-2016-0231

I oppose the transportation of high-level nuclear waste through Denton County, Texas.

**November 3, 2020**

RE: The proposed Nuclear Regulatory Commission licensing of Consolidated Interim Storage Facility (CISF) for spent nuclear fuel (SNF) and greater than Class C (GTCC) waste at Waste Control Specialists' existing low-level radioactive waste site in Andrews County, Texas.

RE: Nuclear Regulatory Commission (NRC) on the draft Environmental Impact Statement (EIS), Docket ID NRC-2016-0231

To Whom It May Concern:

I am writing to alert you about a serious health and safety issue facing Texas. Dangerous high-level radioactive waste from nuclear facilities across the country could be transported through the center of Texas cities on rail routes to be stored above ground for four decades in Andrews County, Texas. This would potentially create a dangerous, de facto permanent storage site in Texas which was never designed or safe for that purpose. A similar Consolidated Interim Storage proposal would import this same dangerous waste to nearby site in New Mexico. Both sites would create great risks during transport through Texas and at the storage sites. This proposal is considered temporary storage dependent on permanent repository being found. Both projects are a band-aid approach when long-term storage is needed.

### **Better Public Process is Needed**

Please ask the Nuclear Regulatory Commission to host and promote in-person public meetings in Amarillo, Dallas, Fort Worth, Houston, Lubbock, Midland, and San Antonio and in major cities throughout the country. The webinars the NRC is using during the pandemic are an inadequate substitute for in-person public meetings. Democratic process and opportunities for the public to participate are especially crucial due to the unprecedented magnitude of waste that could be hauled across the country and the long-lasting impacts of potential radioactive contamination. NRC webinar meeting participation requires a computer plus a phone, internet and adequate bandwidth, which are not always available for some people who might otherwise participate. The NRC should commit to holding in-person public meetings in cities through which radioactive waste is likely to be transported, beginning six months after the risks of the Covid 19 pandemic are over. The NRC has just announced online meetings in Andrews, Texas, (far from most of Texas' cities) on October 1, 6, 8, and 15.

## **Risky Nuclear Waste Proposals**

Two companies seek a Consolidated Interim Storage license from the Nuclear Regulatory Commission. Waste Control Storage/Interim Storage Partners (WCS/ISP) wants to store 40,000 metric tons of irradiated nuclear fuel above ground for 40 years, or longer, at the Waste Control Specialists existing site in Andrews County, Texas. Waste Control Specialists (WCS) and their partner Orano USA, an international company, together comprise Interim Storage Partners, Inc.

Holtec seeks a similar license to store over 173,000 metric tons of this waste in Southeastern New Mexico with casks slightly below ground and the container tops showing. The concern is the high-level radioactive waste will be transported through Texas to get to New Mexico.

High-level radioactive waste consists of spent nuclear fuel rods, the hottest, most dangerous nuclear waste. When these rods are removed from a nuclear reactor, they are cooled in spent fuel pools for 5 to 10 years. Then they are stored above-ground in thin steel canisters surrounded by concrete, which is known as dry cask storage. Licenses allow the dry casks to be stored at the reactor site or nearby for up to 60 years past reactor closure.

Governor Greg Abbott said in June 2019, “Some people want to make Texas the radioactive waste dumping ground of America. I won't let that happen.” We hope that he will keep this promise.

If the facility is licensed, tens of thousands of shipments of dangerous radioactive waste would occur on rail lines going through 44 states. In Texas, shipments could occur through Lubbock, Amarillo, Dallas, Fort Worth, El Paso, Midland, Texarkana, Houston, Beaumont, Corpus Christi, and San Antonio, as well as through many small towns. Trains would go through major industrial, business, residential and agricultural areas, next to country clubs, schools, hospitals, military bases, refineries and sports stadiums. Transporting this high-level waste through our communities would create huge risks from leaks, accidents, or potential sabotage. Waste could come into the Houston Ship Channel and be put on trains there.

Radioactive releases could threaten the health of people living along the transportation routes. Many people living within a half mile of rail lines are low income and many are people of color. Often train cars are left to sit on train tracks and in station yards for hours and days. Exposure to the storage casks is the equivalent of one to two chest x-rays per hour at 6.6 feet distance, according to the NRC. Trains cannot stop quickly or swerve. The average freight train consisting of 100 cars and weighing anywhere from 12 million to 20 million pounds takes over a mile to stop in emergency braking, according to Washington Utilities and Transportation Commission. The impacts of an accident involving very heavy rails cars carrying radioactive waste could be truly disastrous.

I am particularly concerned about transport through Denton County, Texas where I live. The proposed route is along Union Pacific corridors from the north, entering Denton County just north of Pilot Point at the Grayson County line parallel to US 377, then southwest near Aubrey to

Denton parallel to Mingo Road through the Downtown Denton Transit Center area, then continuing south parallel to US 377 through Argyle and Roanoke to the Tarrant County line.

### **Public Process Must Improve**

The public should be informed about the health and safety risks as well as financial liabilities to Texans and have opportunities to comment, but the democratic process has been woefully inadequate so far. The NRC has held only one public meeting on this important issue in Texas. The February 15, 2017, meeting in Andrews was too far away for many Texans to attend. One meeting was held online, but none were ever held in the many Texas cities that could be directly impacted by high-level radioactive waste transport. By contrast, for the Yucca Mountain repository, over two dozen meetings were held throughout the nation.

Permanent disposal of high-level radioactive waste must keep the waste isolated from living things for a million years, but the Yucca Mountain location in Nevada was not viable, and the project was canceled. The band-aid interim style approach to store the deadly waste in Texas and/or News Mexico, Consolidated Interim Storage (CIS), could turn into dangerous de-facto permanent disposal at sites never designed for the long term.

Hardened on-site storage, known as HOSS, is the least risky approach to radioactive waste at this time. With HOSS, the waste must be safeguarded as close to the site of generation as possible, and transport should be minimized. Storage system designs should have projected releases low enough that an attack on the storage systems would be unattractive as a terrorist target. Research must continue for viable permanent disposal.

Please request public meetings in major Texas cities, beginning 60 days after the Covid crisis is over. The Holtec comment period ends September 22, 2020, and the WCS/ ISP comment period ends November 3, 2020.

Your help is greatly needed to protect public health, the environment, and the democratic process with transparency, accountability, and justice for all.

Thank you for serving and protecting the people.

Sincerely,

Jan Johnson  
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League of Women Voters of Denton  
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**Created By:** jjohnson1209@gmail.com

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