

From: Janet <contactus@cardnm.org>
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To: WCS_CISFEIS Resource
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Comments on
NUREG-2239
Environmental Impact Statement
for Interim Storage Partners
LLC's License Application
for a
Consolidated Interim Storage
Facility for Spent Nuclear Fuel in
Andrews County, Texas
Docket ID: NRC 2016-0231
Karst

The latest USGS map of karst in the United States (ben szukalski, July 24,2014) shows us, as did many older maps, that Southeastern New Mexico is riddled with karst, where water runs underground in shallow fissures. The Nuclear Regulatory Commission forbids the siting of nuclear facilities in karst yet no nuclear facility in SE New Mexico has ever taken a critical look at their proposed site in respect to karst. To discover these discrete channels, one must take a careful look at the region surrounding the site, slant drill or use an electrical resistivity survey, all methods tried and true but none used.

During the hearing concerning Urenco's original discharge permit, Baker Spring, located between the WCS and Urenco facility (WCS and Urenco are on the same property, bisected by the state line.) was claimed by Dr. Richard Phillips (a geomorphologist who was at that time our consultant) to be a karstic formation. Kevin Meyers of NMED confirmed the location of the spring as did USGS maps that claimed Baker Springs to be a permanent feature. Phillips presented a photo of the springs showing karstic caves by a small pond where a duck floated.

When the WCS DEIS talks about the runoff to Baker Springs they do not note that some of that runoff goes through karstic channels.

Groundwater Depth

In the CARD/AFES closing argument to WCS application for groundwater discharge, we stated:"Unfortunately, NMED seems unsure even of where the groundwater most likely to be affected is, listing it in this draft permit first at 19-35 feet, then saying it's at 225 feet, while finally changing their mind during the hearing and saying it's at 600 feet."

The WCS DEIS skirts the problem of knowing at what depth groundwater lies by claiming that the shallow ground water is discontinuous:"Excavation of site soils for construction of the SNF pads is not expected to encounter groundwater, because shallow groundwater is discontinuous and deeper

groundwater is at sufficient depth {over 18 m [60ft]} below the 3 m [10 ft] excavation depth." *Ground water; Construction, 12, 13, 14*

This statement leaves a number of questions unanswered:

Does shallow groundwater exist where WCS intends to put high level waste?

Is the perched or shallow groundwater at the site connected with deeper groundwater?

What portion of the surface area at WCS is covered by shallow or perched ground water?

What is the source of the perched or shallow ground water?

Is the perched or shallow ground water in stasis or in flux?

Yet under *Operations; 29, 30, 31* we are told " (iii) geohydrologic conditions and the depth of the groundwater, and the discontinuity of shallow groundwater, potential radiological contamination of groundwater is unlikely during operations.

These comments amount to a circular argument lacking statistical support and a basis in fact.

Environmental Justice

There are many forms of Environmental Injustice. In the case of the current document being reviewed:

WCS' siting, close to the NM border and up gradient from New Mexico is in itself an environmental injustice. New Mexico has one of the US' lowest median incomes; it suffers from housing the nuclear industry for over a half century; it is a minority majority state.

Added to that is the cursory nature of this environmental impact study. One cannot know, for various reasons resulting from not dealing with water issues to the detail needed for this very large, dangerous project, whether the water resources of our state will be degraded by this project.

The vagueness of the DEIS concerning water resources is insulting. This is the Southwest where water is more precious than gold. It would be easy to wipe out the town of Eunice by contaminating the water. There is no part of the DEIS that is reassuring. It reads like many documents concerning contamination from other nuclear sites: 'Even though we cannot tell you the nature of the ground water at the WCS site, don't worry.' Maybe we would not be concerned if Navajo and Pueblo families were not dying from uranium contamination or the Trinity Site Downwinders were not dying from exposure to atomic tests or Los Alamos workers were not dying from lack of proper protection from radiation. But all of that is happening here now. These are some of the reasons that 'don't worry' instead of a proper environmental impact statement from the nuclear industry is not enough, nor will it ever be.

Sincerely,

Janet Greenwald

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