

From: Margaret Gundersen <info@sg.actionnetwork.org>
Sent: Tuesday, September 22, 2020 3:05 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Halt the license for radioactive waste storage

office of administration,

Office of Administration

Mail Stop: TWFN-7-A60M

Attn: Program Management, Announcements and Editing Staff

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

RE: Draft Environmental Impact Statement (DEIS), Docket No. 72-1050; NRC-2016-0231 Interim Storage Project's license application to construct and operate a Consolidated Interim Storage Facility (CISF) for spent nuclear fuel (SNF) and Greater-Than Class C (GTCC) waste.

Dear NRC Commissioners and Staff,

Fairewinds files this letter in opposition to the CISF:

First, there is no regulatory limit for the duration for how long any highly radioactive material will be stored at this location. Therefore, the very title of the application is a misnomer. In reality, this is not "Interim" storage; instead, the duration is actually 'Indeterminate'. These communities might have this waste for 5 or 10-years or for the entire 250,000 years needed for high-level radioactive waste to decay away. Can you even envision 250,000 years? At Fairewinds we cannot! Granting a license with no statutory end date is part of the corporate nuclear game so that the community forced to accept this waste is unable to create any reliable environmental and safety assessments.

Second, given there is no end date for how long the highly radioactive material may remain on-site, the waste is not being "stored" by any means. Rather, it is being abandoned! Again, the title of the license application is a misnomer.

Third, no matter how they are counted, there would be thousands of waste canisters placed at this location. The contents within each canister are highly radioactive, brittle, physically hot, and extremely corrosive. The likelihood of one or more canisters failing is significant and only increases the longer they remain on-site. The corrosive substances held inside each canister will cause chemical attacks on the canister liner and its welds.

Fourth, the duration of canister "storage" is indeterminate, so the probability of canister failure becomes increasingly likely the longer each canister remains on-site. Therefore, an accident releasing large amounts of radioactivity is quite likely. There has been no opportunity for the community to seek expert evaluation, or for any of the agencies to hold the requisite public hearings, and to take expert witness testimony regarding the consequences of a radioactive release of this magnitude. This is an environmental justice issue for the entire region.

Fifth, no building or facility has been designed or included in this license application in order to facilitate regular inspections and promote any repairs these canisters may incur. In other words, this must be addressed to prevent and mitigate catastrophic leaks and protect the surrounding communities.

Sixth, this is a significant environmental injustice issue! The proposed facility is located in a rural area that is financially impoverished and contains a large minority population. The people living here lack the finances to mount a significant legal defense and also fear retribution from the corporation and its cronies. As in most environmental injustice areas, there will be only low-paying menial jobs for locals while the high-paying supervisory positions will go to privileged classes headquartered elsewhere. The risk to surrounding communities is huge! Furthermore, there are no protections for the local communities and the families who live there.

Seventh, the facility license violates the Waste Policy Act.

And, eighth, locating such a large amount of lethal nuclear material in a single location creates a significant target for terrorists, who may be homegrown nationalists or militia members, like Timothy McVeigh. The community would also be at-risk for an attack by a rogue nation. This risk has not been evaluated in the on-going license application process for

the security of the community, the states involved, and our country as a whole.

Therefore, Fairewinds Energy Education adds these brief additional comments to the record and supports comments provided by signatories with NIRS and SEED in opposition to the WCS' Radioactive Waste Dump and massive nuclear transport and licensing of illegal, proposed CIS facilities in New Mexico and Texas.

Fairewinds opposes 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.

Thank you,

Margaret Gundersen

maggie@fairewindsenergy.com

520 Folly Road, Ste 25-344

Charleston, South Carolina 29412

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