

From: Bruce Campbell <info@sg.actionnetwork.org>
Sent: Tuesday, September 22, 2020 2:57 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Reject licenses 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,

Interim Storage Project's application would lead to the import and storage of 40,000 tons of spent nuclear fuel from nuclear reactors around the country in Andrews County, Texas, for 40 years, or perhaps forever. This environmentally unjust plan and would target a largely Latinx region of the country with the deadliest nuclear waste. The region is unsuitable for storing nuclear waste since it's prone to earthquakes, sinkholes, temperature extremes, wildfires, intense storms and flooding.

Nationwide, this plan would jeopardize the health and safety of millions of people unnecessarily due to risks from potential leaks, sabotage or transportation accidents. Consolidated interim storage is an illegal band-aid approach to radioactive waste problems that fails to get the waste into permanent disposal for long-term isolation.

The NRC has ignored many key health and safety issues raised in thousands of previous comments and in 100 legal contentions, many of which were backed by expert testimony. The inadequate Draft Environmental Impact Statement (DEIS) shows that

the NRC is still not addressing these concerns.

No hot cell is proposed, which should be mandatory for this type of facility. There would be no way to repackage radioactive waste from a cracked or leaking canister, and no way to move it anywhere as a result.

Threats from terrorism aren't adequately addressed and the potential use of drones wasn't considered. There is no discussion of whether the waste could go critical and under what conditions this could occur. Hardened Onsite Storage Systems (HOSS) was not considered as an alternative to Consolidated Interim Storage, a glaring omission.

Transportation routes were not designated and accident risks have been artificially minimized. State of Nevada Yucca Mountain studies found that a single small accident could permanently contaminate 42 square miles of land. Radioactive Waste Management Associates' found that 1370 latent cancer fatalities could result from a rail accident with spent nuclear fuel, with costs of \$145 - \$270 billion for a severe accident. The DEIS ignores available scientific data and wrongly minimizes these risks.

The DEIS fails to adequately analyze cumulative impacts of the proposed facility and nearby sites on workers, local people and the environment. Natural disasters or an accident could create cumulative impacts. A fire and a subsequent radiation release at the nearby WIPP site cost \$2 billion to remediate, but this was never mentioned. The DEIS fails to analyze impacts of potential groundwater could have on viability of the storage pad, which must be able to support extremely heavy casks and canisters.

The risks of creating a dangerous de facto permanent site interim were not included, although Former NRC Chairman Gregory Jaczko has said that a consolidated interim storage facility should be viewed as a permanent facility. Nuclear waste should not be moved across the country to a site not designed for permanent disposal.

This nation must end environmental injustice and halt disproportionate impacts on people of color. Dumping the most toxic nuclear waste of a whole nation on the largely Latinx Southwest region is the height of environmental injustice.

It's time to protect the land, air and water, wildlife, plant life and aquifers of this region

and transport regions along the way. Businesses at risk include pecan growers, the ranching and dairy industries and the oil and gas industry.

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.

I was going to type all my own comments, but the canned comments have such great points that I decided to send it in as well.

I expected to find a major section in the DEIS which discussed transportation routes, so imagine my surprise when the "map" of such looked like a primary school student took a magic marker and drew a few somewhat curvy lines on a map of the USA. That is totally pathetic, and should result either in the withdrawal of the so-called CIS radwaste dumpsite proposals, or at least in drawing attention to the desperate need to indicate transportation routes from 115 other radwaste "origin" points to one or another of the proposed CIS sites in Texas and New Mexico.

Yes, every single port, highway, spur road, and rail line which may transport spent fuel rod assemblies must be detailed in a SUPPLEMENTAL DEIS !!!

Let's see, this document drew nearly worthless simple lines indicating routes from a few sites to the people-of-color community dumping grounds in TX and NM. I would hope the other 115 would be in a single supplemental DEIS document, but if you want to come out with 29 or 30 Supplemental DEISs in order to finally get in all the transpo routes which apparently those who wish to operate the dumps desperately want to keep secret from the public's prying eyes.

Simple reality is indicated on videotape from a Community Engagement Panel hearing in the general San Onofre nuclear dump area that Dr. Krishna Singh, a Holtec company executive, is recorded as saying that his company's CANISTERS "cannot be inspected, re-packaged, or transported".

I call for this common sense principle that any container which holds spent fuel radioactive waste must be designed and manufactured to allow inspection, re-packaging, and eventual transport of containers. Thus, such radwaste containers like the Holtec company's very thin (1/2 inch & 5/8 of an inch thick) canisters must clearly never be allowed on any rail or road system or port in the USA. And certainly a Holtec-related so-called interim dump for spent fuel from commercial nuclear reactors in southeastern New Mexico must never receive even one container which was not designed and manufactured to be inspected, re-packaged, or transported. If such a container is found being accepted at the Holtec or other so-called CIS dumpsite, then the operating license must be pulled to not allow any more of this dangerous transport and dumping activity. (The canned comment above mentioning how the proposals do not allow for an area in which to re-package some radwaste containers which may be leaking or otherwise have insufficient containment. If you want to even pretend to try to operate safely, you need radwaste re-packaging areas not only at each so-called CIS dumpsite, but at plenty of nuclear reactor sites around the nation -- especially if spent fuel pool buildings have been destroyed. It would be pure folly to transport claimed-to-be non-transportable thin overstuffed Holtec canisters and not even have a location to re-package such canisters if the miracle happens that the deemed to be untransportable thin overstuffed canisters actually do arrive at a so-called CIS dumpsite.)

There was insufficient discussion in the DEIS about how the spent fuel rod assemblies from "high burn-up fuel" is literally much hotter and apparently somewhat more radioactive (so hot that they vent the container which allows corrosive sea air in while letting heat and radionuclides out). I have heard it claimed that one may need to wait until the end of this century in order to move spent fuel rod assemblies containing waste from "high burn-up fuel", while nearly all except those utility and nuclear industry forces trying to hoodwink and rip-off the public agree that this kind of radwaste (apparently all commercial nuclear reactors in the USA began using such fuel right around the year 2000) would need to cool at least until 2050 until it has a prayer of being transported -- which would depend either on ignoring law and common sense, as well as on "re-packaging" of the thin overstuffed Holtec canisters so that there is an eventual possibility of transport from such reactor sites.

Please either withdraw these so-called CIS proposals, or at least come out with a Supplemental DEIS (or 29 or 30 more Supplemental DEISs if you only wish to address 4

transportation routes per DEIS as with this one) to address all rail, road, and port routes which might be used to transport spent fuel radwaste.

If you do not withdraw these documents and their related proposals, then be sure to REJECT BOTH LICENSE APPLICATIONS to operate these likely permanent radwaste dumps in the Permian Basin fracking-central area of Texas. Supplemental DEISs not only need to address natural seismicity in the area, but the unnatural seismicity encouraged by frackers disintegrating the land and polluting the waters of the region

Thank you for your consideration,

Bruce Campbell
madroneweb@aol.com
10008 National Bl. #163
Los Angeles, California 90034

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