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September 18, 2020

Office of Administration,
Mail Stop: TWFN-7-A60M,
ATTN: Program Management, Announcements and Editing Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI Comments on the Holtec International HI-STORE Consolidated Interim Storage Facility Project Draft Environmental Impact Statement, 85 Federal Register 16,150, March 20, 2020

Docket No. 72-1051; NRC-2018-0052

Project Number: 689

Dear Program Management, Announcements and Editing Staff:

The Nuclear Energy Institute (NEI)¹ is pleased to provide comments to the Nuclear Regulatory Commission regarding the subject Draft Environmental Impact Statement (DEIS) for Holtec International's proposed HI-STORE Consolidated Interim Storage Facility (CIS) Project. NEI has a longstanding policy of supporting the development of a consolidated spent nuclear fuel storage facility in parallel with completion of the Nuclear Regulatory Commission's (NRC) review of the Yucca Mountain repository license application. The purpose and need of this project are straightforward: to provide a safe, retrievable storage facility where nuclear materials currently stored at numerous installations across the country can be consolidated in preparation for future relocation to a final repository.

In preparing the Draft Environmental Impact Statement (DEIS) regarding this project, the NRC, along with the with Bureau of Land Management (BLM) and the New Mexico Environmental Department (NMED) as cooperating agencies, have satisfied their obligations under the National Environmental Policy Act (NEPA) in a fair, thorough, and timely manner. NRC staff's recommendation that the analysis in this DEIS supports the issuance of a license to Holtec to construct and operate the proposed CIS facility comports with what has been learned from industry's 34 years of experience operating similar storage facilities at 73 locations in 34

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

states. The environmental impacts associated with dry cask storage of used nuclear fuel using the same technologies being planned at this facility have indeed been demonstrated to be small.

Similarly, BLM's recommendation that the analysis in this DEIS supports issuance of a permit to construct and operate a rail spur to the proposed CIS facility is well supported by experience. More than 1,300 spent fuel shipments have been completed safely in the United States over the past 35 years. And worldwide, there have been at least 20,000 safe shipments of more than 80,000 metric tons of spent nuclear fuel. The statement in NRC's DEIS Overview² that "All of the estimated public health effects from the proposed incident-free SNF transportation for all phases are below the thresholds for health effects and, therefore, are most likely to be zero" is well supported. NRC has also appropriately relied on its long history of robust and conservative transportation risk assessments to conclude that "there is no accidental release of canistered fuel during transportation under the most severe impacts."

There are two other aspects of the DEIS that are particularly notable.

- First, NRC staff's comparison of the proposed CIS facility costs to the costs of the No-Action alternative – which would leave spent fuel to be managed at dozens of sites across the country even after reactors have shut down and been otherwise decommissioned – shows that "In all cases, the No-Action alternative costs exceed the proposed action costs."³
- And secondly, NRC staff's socioeconomic analysis of the proposed action finds that the impacts resulting from construction of the proposed CIS facility "would be SMALL for population, employment, housing, and public services and MODERATE and beneficial for local finance."⁴

In reaching these two findings, the DEIS demonstrates that the proposed facility is in the public interest both to the local community that will receive the direct economic benefits, and to electricity ratepayers nationwide who would no longer be burdened with the higher costs of the No Action alternative. Also, for shutdown reactor sites, the proposed CIS facility will have the additional benefit of allowing communities to redevelop areas that can be reclaimed once spent fuel stored there is removed.

We commend NRC for taking a safe and responsible approach for receiving public comments during the ongoing COVID-19 pandemic. By extending the public comment period to six months and conducting six public meetings during which numerous participants offered comments by phone, NRC has provided ample opportunity for public input during a time when conducting face-to-face meetings would not have been advisable.

Responsible, well-planned consolidated interim storage of used nuclear fuel – as proposed by this project – fits firmly into what Congress had in mind when, in enacting NEPA, it sought the balance of "enjoyable harmony between man and his environment." Accordingly, we believe that this project is in the long-term best interest of the United States as a nation, the Eddy-Lea region of New Mexico, and the communities from where currently stored spent fuel will be removed. As such, it is an important U.S. infrastructure

² Overview Document ML20073P254 and Section 4.3.1.2.2.1 of the DEIS

³ Section 8.5.2 of the DEIS

⁴ Section 4.11.1.1 of the DEIS

project that requires predictable licensing, and therefore we urge you to finalize this EIS without further delay.

Sincerely,

A handwritten signature in black ink, appearing to read "Rod McCullum", written in a cursive style.

Rod McCullum

c: Andrea Kock, NRC/NMSS/DFM
 John Lubinski, NRC/NMSS
 Annette L. Vietti-Cook

McCloskey, Bridin

Attachments: 09-18-20_NRC NEI Comments On Draft Holtec EIS comments from Holtec.pdf

From: "McCULLUM, Rodney" <rxm@nei.org>

Subject: [External_Sender] NEI Comments on the Holtec International HI–STORE Consolidated Interim Storage Facility

Date: 18 September 2020 13:06

To: "Borges Roman, Jennifer" <Jennifer.BorgesRoman@nrc.gov>

Cc: "Kock, Andrea" <Andrea.Kock@nrc.gov>, "Lubinski, John" <John.Lubinski@nrc.gov>, "Vietti-Cook, Annette" <Annette.Vietti-Cook@nrc.gov>

THE ATTACHMENT CONTAINS THE COMPLETE CONTENTS OF THE LETTER

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Responsible, well-planned consolidated interim storage of used nuclear fuel – as proposed by this project – fits firmly into what Congress had in mind when, in enacting NEPA, it sought the balance of "enjoyable harmony between man and his environment." Accordingly, we believe that this project is in the long-term best interest of the United States as a nation, the Eddy-Lea region of New Mexico, and the communities from where currently stored spent fuel will be removed. As such, it is an important U.S. infrastructure project that requires predictable licensing, and therefore we urge you to finalize this EIS without further delay.

Sincerely,

Rodney McCullum
Senior Director,
Decommissioning & Used Fuel

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