

March ____, 2017

By email to: WCS_CISF_EIS@nrc.gov

Ms. Cindy Bladey, Office of Administration
Mail Stop: OWFN-12-HO8
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Docket No. 72-1050; NRC-2016-0231 – Environmental Impact Statement
Public Scoping Comments about Waste Control Specialists LLC's
Consolidated Interim Spent Fuel Storage Facility Project

Dear Ms. Bladey and the Nuclear Regulatory Commission:

The application of Waste Control Specialists (WCS) for a license to import half of the existing inventory of irradiated nuclear fuel from commercial nuclear power plants from around the country and store it at their dump site in Andrews County, Texas, for 40 years (or longer) is inadequate to address the myriad of problems with the proposed project. It does not protect public health, safety and the environment.

Please know that I do not consent to my region becoming a national radioactive waste dumping ground. We should not have to risk contamination of our land, aquifers or air or the health of plants, wildlife and livestock for a temporary irradiated fuel "solution." The irradiated fuel should remain where it is. Every time it is moved, it creates more hazard and risk. The irradiated fuel only should be moved once when a geological repository is ready.

If the Nuclear Regulatory Commission (NRC) proceeds, then the scope of the draft Environmental Impact Statement (EIS) for the proposed *de facto* permanent parking lot dump should include impacts to the following aquifers: the Dockum, Ogallala, Pecos Valley, and Edwards-Trinity. The analysis should include impacts if there is a release from the storage pad or from moving waste at the WCS site. The draft EIS should review and provide response comments about the recommendations of the Texas Commission on Environmental Quality (TCEQ) Radioactive Materials Division to deny a license for "low-level" radioactive waste at the WCS site due to the proximity of groundwater.

The draft EIS should include a designation of water, rail and road transportation routes and the array of potential impacts of accidents and/or terrorism incidents that could occur along the routes over the proposed 24 years of operations. It should also include accident and terrorism incidents at the site. Even one small accident would be one too many. Despite assurances that accident damage would be minimal, real life disasters have been known to exceed the worst anticipated scenarios: witness the March 16, 2011 Fukushima-Daiichi nuclear disaster in Japan.

A single rail car could haul waste containing as much plutonium as the U.S. bomb dropped on Nagasaki. There have been serious train accidents in the region. Just last year, two trains collided head-on in West Texas at 65 mph. Although testing of the transportation casks have been conducted for accidents up to 60 mph, this scenario has already been exceeded in the region with great consequences. The draft EIS should address the increased transportation risks.

A 2014 TCEQ report warned of potential sabotage of radioactive waste shipments and suggested that such an incident would most likely occur in a large city rather than in a rural area. Terrorist actions involving irradiated nuclear fuel in the metropolitan areas along the routes would be an unimaginable nightmare anywhere.

Homeowners' insurance does not cover radioactive contamination. The draft EIS should explain how homeowners and renters along the transportation routes and near the WCS site will be covered in case of an accident and/or terrorism incident.

The draft EIS must include how the WCS will be monitored for radiation, toxic and hazardous releases to the air, soil and water. It should include what independent community and state of New Mexico and state of Texas monitoring will occur. Further, given the number of nuclear facilities in the area, including the Urenco uranium enrichment facility, the proposed Eddy-Lea Energy Alliance - Holtec site, as well as the Waste Isolation Pilot Plant (WIPP), the cumulative impacts of releases from the multiple facilities must be addressed. Site security, engineering adequacy of the storage pads and the probabilistic seismic hazard analysis must be addressed in the draft EIS, as well as the adequacy, maintenance and service life of the crane that would move the irradiated nuclear fuel.

The draft EIS should explain in detail, along with cites to the applicable regulatory requirements, how radioactive waste from a cracked and/or leaking canister would be handled. It appears that the WCS license application omits construction and operation of a wet pool or hot cell for such transfers. WCS and NRC should explain how transfers would be done and omit statements that they will figure it out when the problem arises.

Above-ground casks would be exposed to the weathering effects of temperature extremes, and natural disasters, including wildfires, tornadoes and earthquakes. The draft EIS should address these issues and answer the following questions:

- At what point could the irradiated fuel go critical?
- What interactions and contact with other radioactive waste, and with the toxic and hazardous materials stored and disposed of at the WCS site, could occur?
- What are the cumulative impacts of waste storage and disposal and the proposed storage of irradiated nuclear fuel at WCS and at nearby sites to workers, local people and the environment?

- How could natural disasters add to the cumulative risks and impacts?
- What are the impacts of a highly unlikely, but significant release of radioactivity at the site?

I respectfully request that NRC hold a public hearing on the draft Environmental Impact Statement in our region. I would appreciate a written response.

Sincerely,

Name:

Contact Info: