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TO: Holtec-CISFEIS@nrc.gov

Subject: Draft Environmental Impact Statement (DEIS) for HOLTEC International's Application for a Consolidated Interim Storage Facility for Spent Nuclear Fuel and High Level Waste; Docket ID NRC-2018-0052

Dear Nuclear Regulatory Commission (NRC):

I oppose the Holtec plan to bring all of the nation's commercial high-level radioactive waste to New Mexico, and I oppose bringing any such waste to the state. I agree with New Mexico Governor Michelle Lujan Grisham that the Holtec project "poses significant and unacceptable risks to New Mexicans, our environment and our economy."

While Holtec says that it wants to use the site for 120 years, the DEIS limits its analysis to 40 years. That is clearly inadequate and not technically credible. Since the NRC has found that waste can safely remain where it is for at least 120 years, that is clearly safer for the next 40 years than packaging the waste and shipping by railroad through dozens of states – mostly in the eastern half of the nation – to New Mexico. Moreover, since there is no permanent disposal site, it is not credible to say that the waste at the Holtec site would ever leave.

The fact that Holtec's plan to have the federal government own and pay for waste transportation is not legal under current law is not discussed in the DEIS. Holtec has stated that it is lobbying Congress to change the law, but NRC is not supposed to engage in such lobbying, even though the agency gives the appearance of supporting such a change in the law by supporting the Holtec plan.

NRC did not keep its promise for five or more in-person meetings in New Mexico. Instead NRC held inadequate and technologically challenged virtual meetings where many people did not have access; if they were able to access the meeting, they had trouble hearing the speakers; and there were delays of up to five minutes between speakers.

I agree with Senators Udall and Heinrich that "there is no compelling public interest reason to justify this rush to replace meetings with virtual webinars, and this decision gives the Commission the appearance of valuing the preferences of a for-profit company looking to store highly dangerous nuclear waste over that of the public and their elected representatives."

I also agree with New Mexico Governor Michelle Lujan Grisham who opposes the Holtec project because it "poses significant and unacceptable risks to New Mexicans, our environment and our economy."

Thank you for considering and responding to my comments.

Name and address