

March 12, 2017

Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-HO8; WCS_CISF_EIS@nrc.gov
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001;

RE: Docket No. 72-1050; NRC-2016-0231 Waste Control Specialists LLC's Consolidated Interim Spent Fuel Storage Facility Project

Dear Cindy Bladey and NRC:

I write for the more than 2000 members of the Alamo Group of the Lone Star Chapter of the Sierra Club. Our group does **NOT CONSENT** to transport of thousands casks of high level radioactive waste (HLRW), by train and/or truck, through our San Antonio, Texas region. Decades of such transport through our city poses an unacceptably high risk to the lives of millions of Americans. One accident and canister leak, or one terrorist cask diversion and explosion, would destroy human life throughout this part of Texas.

This risk is not only unacceptable, it is unnecessary. There is absolutely no reason why "consolidated interim storage" should be done. This proposal does not solve the real problem, which is that **safe permanent storage** still needs to be developed. That is where all the effort should be placed. "Interim storage" is an expensive diversion from this true goal, and done only at the behest of the nuclear power industry. Current on site HLRW storage remains the best option. Of course it has taken the federal government far longer than expected to develop **safe permanent storage**; however, that doesn't make "interim storage" desirable, safe or cost effective. Every nuclear plant in the country has on site storage, and high level on site security. There will be absolutely zero gain in safety by consolidation, except under the concept of "out of sight out of mind", i.e. that it should be stored "in the middle of nowhere" like West Texas. Real people live in West Texas, and they cannot consent for their grandchildren several generations removed. We in San Antonio do not consent, and cannot consent for our grandchildren several generations removed, to have this unnecessary decades long transport of extremely dangerous HLRW through our community. **We support the NO ACTION alternative.**

As we have seen in Fukushima it is easy for planners and politicians to equate small risks with zero risks. They, however, do not bear the brunt of the real impacts when non zero consequences develop. The people placed at risk bear the burden, in lost lives, lost livelihoods, lost property, lost homelands. These impacts involve more than monetary costs!

Any Environmental Impact Statement for this proposal must include a number of important issues:

- 1) Transportation risks: Thousands of loads of up to 40,000 metric tons of HLRW could be shipped to Andrews County via train and truck. Accident data exist, and show the risks are non-zero. In the present EIS risks should include both accidents

- and terrorists activities along thousands of miles of transport routes through thousands of American communities, large and small. Accident risks would include not only vehicle crashes, but natural hazards such as floods, tornados, fires and hurricanes. Terrorist risks would include not only diversion and blackmail, but bomb, drone and small plane attack, as well as 911 type driver directed crash attack.
- 2) Water contamination: canister loss into waterways during transport is a risk, from crash, bridge or tunnel collapse, driver directed diversion etc. If the casks could not be found and rescued from these waters before spillage of any contents from any canister crack, leak, break or explosion, severe water contamination could occur that could render large bodies of water dead of life and unfit for human contact or consumption.
 - 3) Air contamination: Most of this waste is currently stored as dry cask storage. However, should leakage occur some volatile escape into atmosphere is likely. Even exposure to tiny amounts of HLRW can be lethal.
 - 4) Ground contamination: As has been seen around Los Alamos National Lab, HLRW materials are extremely persistent in the environment. Any spillage of canister contents as dust can be difficult to localize and clean up.
 - 5) First responder risks: Many of the thousands of communities placed at risk by this proposal have only volunteer fire departments. Small community hospitals can be very far apart and minimally staffed. Training and equipment for a radiation accident is already highly technical and expensive, and would be much more so for HLRW. In rural areas, and small and even large cities like San Antonio, a HLRW exposure event would severely challenge, and probably overwhelm the human and medical resources of an entire region.
 - 6) Environmental Justice: Prior to moving to San Antonio, I lived in Midland, Texas for 20 years. I have followed the entire history of WCS from up close. I have toured the facility. The WCS history is one of “mission creep”, now reaching for HLRW. The interactions between WCS, Texas regulatory agencies, and Texas politicians are well known to me. The people in Eunice NM and Andrews TX are predominately lower income lower educated Hispanic people. Why are they being asked to bear this risk? Why are urban areas around the country (and their political representatives of both parties) eager to move this highly toxic waste from where it was generated, and where it produced power, to a “remote” area populated by a relatively poor minority group? I have been to meetings in Andrews and I know the entirely white upper class power structure that keeps people largely quiet in this “company town”.
 - 7) Waste privatization: Currently the nuclear power plants in the U.S., which are largely privately owned, wish to move their HLRW into government hands, so they no longer bear any liability for this waste, which they have been managing for decades. What is the risk of the U.S. Government consolidating and placing into private hands 40,000 metric tons of HLRW? What happens if WCS is bought, as is under current negotiation? Has essentially all human life (the risk contained in these casks) ever been “delegated” by any government in history to one small private company? I don’t believe any private for profit company can be delegated a decades and essentially centuries long responsibility for such material.
 - 8) Monitoring at WCS currently meets only minimum standards, and conditions remain controversial. Much increased radiation, air, ground and ground water

monitoring throughout the site and within surrounding areas of Eunice and Andrews should be required if HLRW is added to the current mix of stored materials.

- 9) What are the cumulative risks of storing multiple categories of non-radioactive, LLR, Fernal, and HLR wastes all in close proximity? Possible multiplier effects of accidents and other events must be closely examined.
- 10) What are the risks of sabotage from within at WCS? What are the risks of deliberate terrorist train or truck crash within WCS? What is the risk of terrorist bomb, drone or plane attack?
- 11) Casks have not been tested for all conditions. In particular, what will be the effects of long term exposure of these casks to extreme West Texas heat, sun, and dryness, interrupted by periods of abrupt deep freezing, ice, snow, rain, and flooding?
- 12) What is the risk at the WCS site of fire, earthquake, flood, and tornado to the casks?
- 13) Are water supplies sufficient at WCS to handle a potential fire related HLRW event (the answer for even a LLRW event is controversial)?
- 14) What are the risks of cask transport in loading trains and trucks at the many power plants, and unloading and moving them around at WCS?
- 15) What are the procedures for handling an event producing a crack, break or leak in a cask? How would such a cask be decontaminated if possible? How would it be transferred to a new storage cask or other safety system, and of what type?
- 16) What additional worker safety measures would be instituted for this HLRW? Since this material is far more concentrated than (often just as toxic) LLRW, these procedures would not be expected to be simply additive.
- 17) "Political environment" impacts: It appears strongly probable that development of "consolidated interim storage" at WCS (or anywhere else) would become the de facto permanent storage site for HLRW. The politicians from areas with nuclear power plants (including Texas) would have no more incentive to spend tax dollars to develop permant storage once they remove this toxic material from the vicinities of Dallas, Houston, New York etc. The people of Eunice and Andrews would find their homes ground zero for eons of surface level life destroying plutonium, without any of the geologic and other protections required for a truly safe, truly permanent repository for HLRW.
- 18) This issue of far more than West Texas import, and EIS hearings should be held around the country. Texas certainly MUST be included.
- 19) The U.S.A. should have had the foresight to look a few decades ahead and see the irresolvable nature of the nuclear waste issue, and should have rejected development of nuclear power. We did not, and now we have thousands of tons of HLRW that will essentially accompany us for eternity. We should at least find a permanent place for it, once and only once. We should not dump it on West Texas under the ruse of "interim storage".

Thank you for the opportunity to provide comments on this important issue.
Sincerely,

Terry Burns, M.D.
Chair, Alamo Group, Lone Star Chapter, Sierra Club