We Do Not Consent! Talking Points for Preparing Public Comments
re: NRC’s Environmental Scoping of Holtec/ELEA CISF Scheme

Use the following as a starting point for preparing your own public comments
by NRC’s May 29, 2018 deadline (see how at bottom)

THE RUSH JOB TO DE FACTO PERMANENT SURFACE STORAGE “PARKING LOT DUMPS,” FOR ALL THE WRONG REASONS: We do not consent to Holtec International/Eddy-Lea Energy Alliance, the rest of the nuclear power industry, the U.S. Nuclear Regulatory Commission (NRC), and the U.S. Dept. of Energy (DOE), rushing into de facto permanent surface storage “parking lot dumps” (so-called “centralized” or “consolidated interim storage facilities,” CISFs, a.k.a. Monitored retrievable Storage sites, or MRS), in order to expedite the transfer of title, liability, and interim storage costs, from the nuclear utilities that profited from the generation of highly radioactive wastes, onto the backs of taxpayers and/or ratepayers.

FLOATING FUKUSHIMAS ON SURFACE WATERS: We do not consent to radioactive waste barge shipments on the lakes and rivers of this country, the fresh drinking water supply for countless millions, nor on the seacoasts. In addition to a disastrous radioactive release if the shipping container is breached, infiltrating water could spark a nuclear chain reaction, if a critical mass forms, due to the fissile U-235 and Pu-239 still present in the waste. (Rail-sized cask shipments bound for Holtec/ELEA, NM, weighing more than 100 metric tons, cannot travel by Legal Weight Truck (LWT) down interstate highways; high-risk barge shipment, for cask transfer onto a train, from some two dozen U.S. atomic reactors lacking direct rail access, to the nearest railhead, is an option that has long been considered.)

MOBILE CHERNOBYS/DIRTY BOMBS ON WHEELS: We do not consent to highly radioactive waste truck and train shipments through the heart of major population centers; through the agricultural heartland; on, over, or alongside the drinking water supplies of our nation. Whether due to high-speed crashes, heavy crushing loads, high-temperature/long duration fires, falls from a great height, underwater submersion, collapsing transport infrastructure, or intentional attack with powerful or sophisticated explosives, such as anti-tank missiles or shaped charges, highly radioactive waste shipments, if breached, could unleash catastrophic amounts of hazardous radioactivity into the environment. (Heavy haul truck shipments – monster puller truck up front, and perhaps even pusher truck in back, with hundreds of wheels on the trailer in between, would be an alternative to barge shipments; Holtec has indicated it can accommodate any and all cask models at its CISF, meaning that smaller cask LWT shipments, down interstate highways, could still be in play, as well.)

ENVIRONMENTAL INJUSTICE/RADIOACTIVE RACISM: We do not consent to the targeting, yet again, of low-income, and/or people of color communities, with highly radioactive waste de facto permanent surface storage “parking lot dumps.” It is most ironic that President Obama’s Blue Ribbon Commission on America’s Nuclear Future (BRC, whose recommendation for CISFs as a top priority, Holtec/ELEA cites), and his DOE, yet again explicitly targeted Native Americans. Obama honored Sauk and Fox environmental activist Grace Thorpe for defending her reservation in Oklahoma against a “parking lot dump,” and then assisting allies at dozens of other reservations being targeted by DOE’s Nuclear Waste Negotiator. Obama praised Thorpe as a “Woman Taking the Lead to Save Our Planet,” alongside the likes of Rachel Carson of Silent Spring fame, in his March 2009 Women’s History Month proclamation. (Similarly, Yucca Mountain, Nevada is Western Shoshone Indian land, as the U.S. government acknowledged by signing a treaty. In addition, Yucca is not scientifically
suitable. It is an active earthquake zone, a volcanic zone, and water-saturated underground. If waste is ever buried there, it will leak massively into the environment. And the State of Nevada has never consented to becoming the country’s high-level radioactive waste dump.) This round of CISF schemes has targeted the s.e. NM/w. TX borderlands, communities with very large Hispanic populations, already heavily polluted by widespread fossil fuel and even nuclear industries. Holtec’s CISF would contribute significantly to these “nuclear sacrifice zone” radioactive risk impacts to health, safety, and the environment. Environmental justice (EJ) demands the Holtec/ELEA CISF be stopped.

**SITES CURRENTLY AT THE VERY TOP OF THE TARGET LIST FOR DE FACTO PERMANENT SURFACE STORAGE “PARKING LOT DUMPS”:** We do not consent to the targeting of nuclear power plants, radioactive waste dumps, or DOE sites, already heavily contaminated with radioactivity and burdened with highly radioactive waste, to become “parking lot dumps” for the importation of other sites’ or reactors’ wastes. DOE, NRC, and industry’s current top target is Holtec/ELEA, NM, located just 38 miles from Waste Control Specialists in Andrews County, TX, right on the stateline at Eunice, NM, currently the second top target for a CISF. WCS, already a national “low-level” radioactive waste dump, is immediately adjacent to the uranium enrichment facility in Eunice; DOE’s Waste Isolation Pilot Plant is very near the Holtec/ELEA CISF site. Such disproportionately large “nuclear sacrifice zone” impacts in this concentrated area represent bad enough EJ violations; the Holtec/ELEA and WCS CISFs would compound these environmental justice (EJ) violations significantly.

**RISKS OF HIGHLY RADIOACTIVE WASTE STORAGE POOLS, AND NEED FOR HARDENED ON-SITE STORAGE (HOSS):** As confirmed multiple times by the U.S. National Academies of Science, and researchers such as Princeton U.’s Von Hippel and Schoeppner, irradiated nuclear fuel storage pools at reactors across the country, are at risk of fires that could unleash catastrophic amounts of hazardous Cesium-137 into the environment over a wide region. Since 2002, a coalition of hundreds of environmental and public interest groups, representing all 50 states, has called for expedited transfer of highly radioactive waste, from vulnerable pools, into hardened dry casks, designed and built to last not decades but centuries, without leaking, safeguarded against accidents and natural disasters, and secured against attack. This hardened on-site storage (HOSS) should be done as close to the point of origin as possible. The rush job to construct and open CISFs such as Holtec/ELEA’s, while such pool risks persist, shows that the nuclear power industry and agencies like NRC and DOE have their priorities upside down.

**NUCLEAR POWER AND HIGHLY RADIOACTIVE WASTE GENERATION:** The mountain of radioactive waste in the U.S. has grown 75 years high, and we still don't know what to do with the first cupful. Radioactive waste may well prove to be a “trans-solutional” problem, one created by humans, but beyond our ability to solve. The only safe, sound solution for radioactive waste is to not make it in the first place. Reactors should be permanently shut down, to stop the generation of highly radioactive waste for which we have no good solution.

Add your additional idea(s) here! Or use the ones above verbatim, or adapt them to your own words.

**HOW TO SUBMIT YOUR PUBLIC COMMENTS TO NRC BY THE MAY 29, 2018 ENVIRONMENTAL SCOPING PERIOD DEADLINE:**

Please include “Docket ID NRC–2018–0052” in your comment submission, such as in the subject line of your e-comments or snail-mailed hard copy comments.
Submit written comments electronically via the Federal Rulemaking website: Go to http://www.regulations.gov and search for Docket ID NRC–2018–0052, then follow the instructions given there.

Submit written comments via snail mail, by sending them to: May Ma; Office of Administration; Mail Stop: TWFN-7-A60M; U.S. Nuclear Regulatory Commission; Washington, DC 20555-0001.

Submit verbal comments at NRC public meetings:

A national phone-in/webinar for public comments on Wednesday, April 25, from 7-9pm Eastern Time; the call-in telephone bridgeline is (888) 946-8389 and the passcode is 6408603; to register for the webinar, go to https://attendee.gotowebinar.com/register/7824864004787186434, fill out the requested info., and submit it; those who live in the Washington, D.C. area could also attend this meeting, to be held at NRC HQ in Rockville, MD, located at 11555 Rockville Pike, to provide verbal comments in person; NRC states -- Members of the public may register in advance to present oral comments by contacting Ms. Antoinette Walker-Smith at (301) 415-6957, or via email at Antoinette.Walker-Smith@nrc.gov, no later than April 23, 2018. Arrive 30 minutes early to allow time for security registration; for more info., see NRC’s website posting at https://adamswebsearch2.nrc.gov/webSearch2/view?AccessionNumber=ML18107A144 -- also see

Those who live near enough to s.e. NM could provide verbal comments by attending in person (no phone-in or webinar being provided by NRC in conjunction with these s.e. NM meetings):

4-7pm Mountain Time, April 30, at Eastern New Mexico University, Roswell Campus, Union Building, Room 110, 48 University Blvd., Roswell, NM;

7-10pm Mountain Time, May 1, at the Lea County Event Center, 5101 N. Lovington Highway, Hobbs, NM;

7-10pm Mountain Time, May 3, at the Eddy County Fire Service, 1400 Commerce St., Carlsbad, NM.

Prepared by Kevin Kamps, Radioactive Waste Specialist at Beyond Nuclear, on April 20, 2018 (adapted and updated from May 28, 2016 two-pager prepared by Kevin Kamps for use in the DOE “Consent-Based Siting” proceeding). For additional information, contact Kevin at kevin@beyondnuclear.org, or (240) 462-3216. To see a longer, more detailed version of these talking points, with links to further background documentation, as well as additional sets of talking points by Beyond Nuclear and other groups, go to http://www.beyondnuclear.org/centralized-storage/2018/4/10/additional-sample-comments-you-can-use-to-write-your-own-for.html