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Public comments to NRC
Meeting on Holtec/ELEA CISF environmental scoping
NRC HQ
Rockville, MD

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Regarding the U.S. Nuclear Regulatory Commission’s (NRC) evaluation of the environmental impacts of building and operating a Centralized or Consolidated Interim Storage Facility (CISF) at the proposed site in Southeast New Mexico, may I point out that very high-risk shipping of the irradiated nuclear fuel out there in the first place is an unavoidable aspect, with LARGE impact, that is part and parcel of this Holtec/ELEA scheme.

The routes, modes, and shipment numbers should be clearly mapped, spelled out, and provided, as shown and done in the U.S. Department of Energy’s (DOE) Yucca Mountain, Nevada Final Environmental Impact Statement (FEIS) in Feb. 2002, and its supplements, as in 2008.

Of course, if the CISF is in truth interim or temporary, then the transport risks will be doubled at the very least, as the irradiated nuclear fuel is shipped a second time, from S.E. NM, to the final so-called deep geologic repository – which is yet to be named or located. (Yucca Mountain, Nevada is certainly not scientifically suitable, nor so from an environmental justice perspective, nor from a legal one – given the Western Shoshone Indian Nation’s 1863 “peace and friendship” Treaty of Ruby Valley with the U.S. government. Besides, the Western Shoshone, as well as the State of NV, do not consent.)

In fact, the highly radioactive wastes could be shipped right back in the same direction from which they came in the first place. This would double those transport risks for the very same communities through which the shipments had already passed en route to NM.

Thus, we demand public comment meetings in places besides Rockville, Maryland, and S.E. NM, where Holtec/ELEA CISF-bound trucks, trains, and/or barges would travel through, and put countless millions of Americans at risk.

The risks include large-scale releases of hazardous radioactivity, as due to severe transport accidents or intentional attacks. Such transport risks are the reason why
critics have long referred to these shipments as potential “Mobile Chernobyls.” Please note that tomorrow, April 26th, 2018, is the 32nd annual commemoration of the beginning of the still ongoing Chernboyl nuclear catastrophe, epi-centered in Ukraine, on the border with Belarus.

But these risks also include “Mobile X-ray Machine That Can’t Be Turned Off” impacts on human health, from hazardous gamma- and neutron-radiation emissions, even during incident-free, routine shipments. Such risks will be greatly exacerbated by externally contaminated casks – scores of such incidents have already occurred in the U.S.; many hundreds of such externally contaminated shipments have occurred in France.

As a resident of Mount Rainier, MD, with an office in Takoma Park, MD, I myself, and my neighbors, face these risks. The CSX railway, that passes through these towns -- including directly through the Takoma Metro Station on the CSX freight train tracks, immediately adjacent to the station platform on the Red Line -- would carry irradiated nuclear fuel bound for this proposed CISF in NM.

During its DEIS (Draft Environmental Impact Statement) public comment proceeding on the Yucca Mountain, NV permanent burial dump proposal back in the year 2000-era, DOE originally had scheduled a dozen public comment meetings across the country – not just in Washington D.C. and Nevada, but in ten additional states that would be impacted by very large numbers of “Mobile Chernobyls” bound for Yucca.

But environmental groups in many additional states, such as Illinois as one example, demanded their own public comment meetings. Under such intense public pressure, as by the environmental watchdog group Nuclear Energy Information Service, DOE scheduled another dozen meetings across the country, including one in Chicago, thus doubling the original count.

NRC even held a Nuclear Waste “Con Game” (Nuclear Waste Confidence Generic EIS and Rule, later renamed Continued Storage of Spent Nuclear Fuel) public comment meeting in Chicago in 2013 – so why not a Holtec/ELEA CISF one now?

DOE even held a “Consent-Based Siting” public comment meeting in Chicago in 2016 – so why not a Holtec/ELEA CISF one now?

Why is it that NRC has scheduled only four meetings, when DOE scheduled six times as many during the Yucca proceeding? Why has NRC scheduled meetings in only two states, when DOE scheduled meetings in nearly two-dozen states?

Even DOE’s two-dozen meetings were not adequate. After all, Yucca-bound shipments of highly radioactive waste are projected to travel through 44 states plus the District of Columbia. Few states in the Lower 48 would be spared the very high risks of such truck, train, and/or barge shipments bound for Nevada.
But the Holtec/ELEA proposal is significantly larger than even the Yucca scheme. Yucca was and is limited by law to a grand total of 70,000 metric tons of highly radioactive waste. Only 63,000 metric tons of that figure (90% of the overall limit) could be commercial irradiated nuclear fuel. (The other 10% would be DOE irradiated nuclear fuel and high-level radioactive waste, as from research and overseas reactors, and vitrified military reprocessing wastes.)

But Holtec/ELEA has proposed 100,000+ metric tons of commercial irradiated nuclear fuel. Holtec/ELEA used to cite the figure of 120,000 metric tons. But in fact, if you multiply the first phase of 8,680 metric tons of uranium -- as described in NRC's March 30, 2018 Federal Register Notice -- by 20 phases, over 20 years, as Holtec proposes, that would mean not 100,000, nor 120,000, but rather 173,000 metric tons of commercial irradiated nuclear fuel!

Clearly, Holtec/ELEA’s CISF plans are much bigger than even the amount of highly radioactive waste targeted at Nevada for permanent burial. Thus, the shipping impacts would also be significantly larger. Instead of 12,145 trucks and trains bound for Nevada through 44 states plus Washington, D.C., a significantly greater number bound for NM can be expected, if Holtec/ELEA gets its way.

For this reason, NRC must hold public comment meetings in at least as many states as DOE did for its Yucca scheme. Major cities that can expect NM-bound road and/or rail shipments would include: Atlanta; Boston; Chicago; Cleveland; Dallas/Forth Worth; Detroit; Houston; Kansas City; Los Angeles; Miami; Minneapolis/Saint Paul; Nashville; New York/Newark; Omaha; Philadelphia; Pittsburgh; Saint Louis; and Tampa.

Why isn’t NRC holding meetings in these cities, given such transport risk impacts?

Why isn’t NRC holding meetings in the following additional port cities, given the potential for first leg barge shipments that could be required, prior to cask transfer onto rail, for export to NM: Baltimore, MD; Norfolk, VA; Wilmington, DE; New Haven, CT; Jersey City, NJ; Milwaukee, WI; Muskegon, MI; Vicksburg, MS; Florence, AL; Oxnard, CA; and Fort Lauderdale, FL.

And last but not least, why isn’t NRC holding meetings in communities where heavy haul truck first leg shipments could be required, prior to transfer of casks onto trains? As but one such example, a location in northern MI, near the Big Rock Point reactor, or the Gaylord railhead, is in order.

In addition to all this, what about the potential for LWT (Legal Weight Truck) shipments of irradiated nuclear fuel to Holtec/ELEA’s CISF in S.E. NM? After all, Holtec/ELEA brags in its license application documents such as the ER (Environmental Report) that it could accommodate any and all NRC-certified casks for shipping and/or storing irradiated nuclear fuel. This would include shipping
casks for LWT transport, which can contain only 4 Pressurized Water Reactor (PWR) irradiated nuclear fuel assemblies, as compared to 24 or even 37 PWR assemblies in rail-sized casks on trains, barges, or heavy haul trucks. If LWT shipments are in fact to be a part of the Holtec/ELEA CISF transport scheme, then communities along interstate highways in most states in the Lower 48 should also be extended public comment meetings, like the one you are holding this evening, and the three you have scheduled for S.E. NM at the end of April and beginning of May.

Thank you.