

May 9, 2018

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SUBJECT: Holtec International HI–STORE Consolidated Interim Storage Facility Project  
Docket No. 72–1051 (Request for 180-day extension of scoping and public  
period and addition of 18 public hearings)

Dear Members of the Commission:

Don't Waste Michigan, Sierra Club, Beyond Nuclear, Citizens for Alternatives to Chemical Contamination, Nuclear Information and Resource Services, Alliance For Environmental Strategies, Nuclear Energy Information Service, Public Citizen, Vermont Yankee Decommissioning Alliance, Uranium Watch, San Luis Obispo Mothers for Peace, Oregon Physicians for Social Responsibility, Sustainable Energy & Economic Development Coalition, New England Coalition on Nuclear Pollution, Ban Michigan Fracking, Hudson River Sloop Clearwater, Inc., Tennessee Environmental Council, Citizens for Alternatives to Radioactive Dumping, Great Lakes Environmental Alliance, Healthy Environment Alliance of Utah, Canadian Coalition for Nuclear Responsibility, Citizens' Environmental Coalition, Portsmouth/Piketon Residents for Environmental Safety and Security, Chesapeake Physicians for Social Responsibility, Nuclear Watch New Mexico, Physicians for Social Responsibility-Los Angeles, Don't Waste Arizona, Tri-Valley Communities Against a Radioactive Environment, Citizens Awareness Network, Friends of the Earth, San Clemente Green, San Luis Obispo County Grandmothers for Peace, Stand Up/Save Lives Campaign, Bruce Peninsula Environment Group, FLOW (For Love Of Water), Concerned Citizens for Nuclear Safety, Milwaukee Riverkeeper, Food & Water Watch/Food and Water Action, Ecological Options Network,

Occupy Bergen County, Citizens' Resistance at Fermi 2, Sisters of Mercy/Albuquerque, Crabshell Alliance, Nukewatch, On Behalf of Planet Earth, Coalition Against Nukes, Nuclear Age Peace Foundation, Cape Downwinders and Physicians for Social Responsibility are all organizations that question or oppose the proposed Holtec International (Holtec) consolidated interim storage facility (CISF) for spent nuclear fuel (SNF) being planned for southeast New Mexico. Many of these organizations are planning to intervene in the forthcoming Nuclear Regulatory Commission (NRC) license proceeding for the Holtec CISF.

We hereby request that the Commission extend the scoping comment period for the CISF proposal by 180 days beyond the present terminus of May 29, 2018. The purpose of this request is to afford an opportunity for the convening of additional public comment hearings in 18 American cities likely to be affected by the large-scale transportation effort that will be caused by the Holtec project, and to allow members of the public additional time to undertake pre-filing investigation.

### **1. The Holtec CISF Plan Is Controversial**

Holtec applied to the NRC by letter dated March 30, 2017 for license authorization to construct and operate a HI-STORE CISF for spent nuclear fuel disposal on a 960-acre site in Lea County, New Mexico. Holtec intends initially to store 500 canisters (8680 metric tons) of SNF, followed by 19 additional phases, all aimed eventually at storing 10,000 canisters and 120,000 or more metric tons. If the first phase is a guide, it may be that more than 170,000 metric tons might end up at Holtec's facility. Even at 120,000 MT, the Holtec CISF would easily be the world's largest SNF interim site.

Holtec plans to provide long-term SNF storage for up to 120 years,<sup>1</sup> or for however much time beyond 120 years it may take to develop a repository.<sup>2</sup> Holtec itself has recommended to the U.S. Department of Energy that a CIS facility "should have a minimum service life of 300 years,"<sup>3</sup> all of which raises legitimate questions as to the possible permanence, fitness and suitability of the Holtec plan for storing high-level spent nuclear fuel in the New Mexico desert.

There is no civilian SNF generated in New Mexico. Tens of thousands of tons of dangerous radioactive waste will be transported into the state from hundreds, even thousands, of

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<sup>1</sup>Holtec International Environmental Report (ER Rev. 1), p. 13/543 of .pdf.

<sup>2</sup>According to the Holtec ER Rev. 1, p. 19/543 of .pdf: "Holtec anticipates the SNF could be stored at the CIS Facility for up to 120 years, *or until a permanent geologic repository is opened consistent with the NRC's Continued Storage Rule.*" (Emphasis added).

<sup>3</sup>Letter, Joy Russell, Holtec Vice-President, to DOE, "Response to RFI on Private Initiatives to Develop Consolidated SNF Storage Facilities," 1/27/2017, <https://www.energy.gov/sites/prod/files/2017/02/f34/Jan%2027%2C%202017%20-%20Joy%20Russell%20-%20Response%20to%20the%20RFI%20on%20Private%20Initiatives.pdf>

miles away, via barge, truck and railroad, followed a century later by a second massive effort of 10,000 more trips, taking the waste away to a permanent geological repository. The waste will pass through 75% of the nation's congressional districts en route to New Mexico. Many of the nation's largest metropolitan areas will endure hundreds of canister transports over decades. The ability of the thin-walled canisters to uniformly withstand travel-related vibrations, moderate jarring, severe accidents or sabotage is dubious.

Once the canisters are delivered, Holtec will store them in shallow concrete burial pits. The Holtec site is situated in a geologically troublesome area. Holtec will minimally monitor the suspect storage canisters in the hopes of avoiding dangerous spills, leakage and criticality for many decades. After 120 years—or longer—the aspiration is that the SNF will again be transported, this time to a final geological repository.

The CISF may have to accept a far larger volume of waste than can be accepted by the ultimate permanent repository. The Department of Energy had aimed to dispose of 63,000 metric tons of commercial power plant SNF in Yucca Mountain, which is only about half of what Holtec proposes to take in. If an undersized permanent geological repository is opened, the excess SNF waste will have to remain in New Mexico for an unknown period.

There is continuing support in the New Mexico legislature and among economic development advocates for reprocessing as a spinoff to the CISF. Reprocessing is a dirty and dangerous means of reclaiming the dangerous isotopes in the waste which may bring a major radioactive waste-producing complex to New Mexico. Holtec's "interim" CISF is undeniably a major component of an enormous undertaking that carries grave national policy and cost implications. The Holtec CISF's centrality to nationwide management of SNF means that additional, nationwide, scoping must be undertaken by the NRC.

## **2. NEPA Scoping to Date for the Holtec CISF Is Grossly Inadequate**

The NRC's public involvement to date under the National Environmental Policy Act (NEPA) does not match the scale of policy, implementation and environmental concerns. On March 30, 2018, the NRC published in the Federal Register a notice of intent to prepare an environmental impact statement and conduct scoping on the Holtec International HI-STORE CISF project.<sup>4</sup> A 60-day public comment period opened by the publication is slated to end on May 29, 2018. Only four public scoping hearings have been convened, including a national phone-in meeting at NRC headquarters in Rockville, Maryland, followed by three hearings in Roswell, Hobbs and Carlsbad, New Mexico, respectively.

This level of public engagement is grossly inadequate for a project of such magnitude. The scoping process for the CISF pales in comparison to the NEPA public outreach for the proposed Yucca Mountain repository. In 1995, the U.S. Department of Energy (DOE) undertook

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<sup>4</sup>83 Fed. Reg. 13802 (March 30, 2018).

a 120-day effort consisting of public comments and scoping hearings for the Yucca draft EIS in 17 U.S. cities and Nevada:

To reach minority and low-income communities, DOE contacted news publications and radio stations that tend to service these communities to notify them of the scoping meetings and the locations of available information. In addition, DOE met with 13 Native American tribes and organizations and provided them the same information. DOE invited public interest groups, transportation interests, industry and utility organizations, regulators, and members of the general public to participate in the process. The Department mailed a series of information releases to Yucca Mountain stakeholders notifying them of the opportunity to comment on the scope of the EIS; sent press releases and public service announcements to newspapers and television and radio stations; and made information about Yucca Mountain, the EIS, and the scoping process available on the Internet (at [www.ymp.gov](http://www.ymp.gov)) and in public reading rooms around the country.

In 1995, DOE held 15 public scoping meetings across the country (DIRS 104630-YMP 1997, p. 7). More than 500 people submitted more than 1,000 comment documents during the 120-day public scoping period. DOE considered all comments—oral and written—it received during the scoping process and grouped them in categories. . . .<sup>5</sup>

Holtec's Environmental Report, the basis for the Draft EIS, largely ignores the massive transportation effort that will be required for the facility to function. The minimal publicity efforts the NRC has conducted to date suggest that the agency may not adequately analyze the transportation implications, and will effectively segment those aspects from the waste storage parts of the proposal. The NRC's poor publicizing of the Holtec application is a far cry from the public involvement that characterized the Yucca Mountain scoping.

### **3. NRC Discretion to Limit Scoping Is Not Unbounded**

The NRC's discretion to limit or restrict NEPA scoping efforts has boundaries.

Scoping is the initial phase of the overall EIS process under NEPA. *Citizens' Comm. to Save Our Canyons v. U.S. Forest Serv.*, 297 F.3d 1012, 1022 (10th Cir.2002). Scoping is "an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action." 40 C.F.R. § 1501.7; *Citizens' Comm. to Save Our Canyons*, 297 F.3d at 1022 (goal of scoping is to "identify [ ] specific issues to be addressed and studied" during the EIS process (citing 40 C.F.R. § 1501.7)).

According to the Ninth Circuit, the primary purpose of the scoping period "is to notify

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<sup>5</sup>"Final Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada," DOE/EIS-0250, Vol. 1, pp. 1-23, 1-24.

those who may be affected by a proposed government action which is governed by NEPA that the relevant entity is beginning the EIS process; this notice requirement ensures that interested parties are aware of and therefore are able to participate meaningfully in the entire EIS process, from start to finish.” *Kootenai Tribe of Idaho v. Veneman*, 313 F.3d 1094, 1116 (9th Cir. 2002), citing *Northwest Coalition for Alternatives to Pesticides (NCAP) v. Lyng*, 844 F.2d 588, 594-95 (9th Cir. 1988).

To initiate the scoping process, the lead agency must publish a Notice of Intention (NOI) in the Federal Register “[a]s soon as practicable after its decision to prepare an [EIS].” 40 C.F.R. § 1501.7. In the notice, the agency must “[i]nvite the participation of affected Federal, State, and local agencies” and “[d]etermine the scope ... and the significant issues to be analyzed in depth in the [EIS].” *Id.* § 1501.7(a)(1), (2). The agency “*may* . . . [s]et time limits” for the scoping process and “[h]old an early scoping meeting or meetings.” *Id.* § 1501.7(b)(2), (4) (emphasis added). Those time limits must comply with 40 C.F.R. § 1501.8. *Id.*, § 1501.7(b)(1). Section 1501.8 does not “prescribe [ ] universal time limits for the entire NEPA process,” but instead authorizes agencies to set time limits, including limits on the scoping process that are “appropriate to individual actions” and “are consistent with the purposes of NEPA and other essential considerations of national policy.” *Id.* § 1501.8.

Council on Environmental Quality (CEQ) regulations do not set minimum time limits for the scoping period and do not require an agency to extend or reopen the scoping period. Congress intended that agency discretion, and not the courts, “be exercised in determining when extra procedural devices should be employed.” *Phillips Petroleum Co. v. U.S. EPA*, 803 F.2d 545, 559 (10th Cir.1986) (emphasis omitted) (quoting *Vermont Yankee Nuclear Power Corp. v. Natural Res. Def. Council*, 435 U.S. 519, 546 (1978) (internal quotation marks omitted)). Thus a reviewing court generally can overturn an agency decision for failure to provide additional procedure only when there are “extremely compelling circumstances.” *Vermont Yankee*, 435 U.S. at 543.

#### **4. Much More Public Participation Is Warranted**

We submit that Holtec’s CISF proposal presents “extremely compelling circumstances” that necessitate much greater NRC scoping outreach and solicitation of public feedback. This immense, expensive and long-duration SNF storage project requires perfect transportation and containment of extraordinarily deadly substances for centuries to come. The continued storage of SNF at reactor sites as an alternative to Holtec requires further consideration. The risks from even one major cask accident or act of sabotage, if it is accompanied by serious radiation leakage, could be more than the public is willing to accept just to have the waste concentrated in New Mexico.

Before the decision to move deadly SNF 20,000 times can be made, the American public outside of New Mexico should be afforded meaningful participation. We therefore request that the scoping period and comment opportunity for the Holtec CISF be extended from May 29, 2018 until November 30, 2018. During that period, we further request that the NRC convene

town hall-style public meetings and comment sessions in the following cities, each of which is located on one or more anticipated major SNF transport routes:

Atlanta  
Boston  
Chicago  
Cleveland  
Dallas/Forth Worth  
Detroit  
San Antonio  
Kansas City  
Los Angeles

Miami  
Minneapolis/Saint Paul  
Nashville  
New York/Newark  
Omaha  
Philadelphia  
Pittsburgh  
St. Louis  
Tampa

The possibility of a spent fuel leak, explosion, criticality or canister breach in any of these urban areas, and the questions of whether and how much Americans and the environment should bear the risks of this massive scheme, should be decided in a process that is truly national, visible and far more extensive.

We request an expedited decision from the NRC on these requests, given the fast-approaching May 29, 2018 deadline.

Thank you very much.

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