Overview of Environmental Coalition Contentions Opposing Holtec/ELEA’s CISF, and the NRC ASLB Licensing Proceeding:


the dozens of contentions filed on September 14, 2018 include the following categories (some of the contentions were raised by multiple intervenors; the total number of contentions filed adds up to 40):

(1) impacts on Native American and other historic and pre-historic properties on the site;
(2) insufficient assurances of financing for construction, operation, and decommissioning;
(3) underestimation of so-called “low-level” radioactive waste volumes that would be generated;
(4) improper reliance on NRC generic Environmental Impact Statement presumptions;
(5) natural gas fracking and potash mining beneath the site;
(6) cumulative risks of future reprocessing (plutonium extraction);
(7) the public health threat from the “Start Clean/Stay Clean” philosophy’s risks of shipping damaged, leaking, or contaminated casks back to the atomic reactor of origin;
(8) incomplete and inadequate disclosure of transportation routes (road, rail, and waterway), and inadequate analyses of the substantial risks of these shipments through most states, over decades;
(9) inconsistent predicted lengths for “interim storage” period, from 40 to 100, 120, or even 300 years, timeframes that could dangerously exceed the design and surface life of the containers;
(10) unmet safety and security risk analyses for the scale of transport and storage proposed;
(11) troubling geological formations and conditions beneath the site;
(12) no compelling purpose and need for the CISF;
(13) risk of the CISF becoming a de facto permanent surface storage “parking lot dump”;
(14) Holtec’s improper reliance on the Blue Ribbon Commission for America’s Nuclear Future’s 2012 Final Report;
(15) earthquake risks at the site;
(16) impacts on endangered and threatened species, such as the dunes sagebrush lizard;
(17) questionable credibility of sub-contractors used in the preparation of the license application, reflected in the poor quality of the submitted documents, and charges of major fraud against Tetra Tech related to a massive radioactive contamination incident in San Francisco, CA;
(18) thermal concerns associated with corrosion of the containers;
(19) groundwater and brine concerns at the site, including threats of radioactive contamination reaching area drinking and irrigation water aquifers downstream;
(20) risks of high burnup irradiated nuclear fuel degradation and failure.

(Continued on next page)
The NRC ASLB oral argument pre-hearings on January 23-24, 2019 in Albuquerque will address "standing and contention admissibility."