

March 25, 2020

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SUBJECT: Docket ID NRC-2018-0052, Holtec International HI–STORE Consolidated  
Interim Storage Facility Project (Request for indefinite DEIS public comment period and  
convening of public hearings at multiple sites)

Dear NRC Commissioners:

Don't Waste Michigan, Sierra Club, Beyond Nuclear, Nuclear Information and Resource  
Service, Alaska's Big Village Network, Alliance for Environmental Strategies, Alliance for a  
Green Economy, Alliance To Halt Fermi-3, Atlanta Grandmothers for Peace, Buckeye  
Environmental Network, Cape Downwinders, Citizen Action New Mexico, Citizens for  
Alternatives to Chemical Contamination, Citizens Awareness Network, Citizens' Environmental  
Coalition, Citizens' Resistance at Fermi 2, Coalition Against Nukes, Coalition on West Valley  
Nuclear Wastes, Concerned Citizens for Nuclear Safety, Council on Intelligent Energy &  
Conservation Policy, Eco-Logic, WBAI-FM, Friends of Bruce, Indian Point Safe Energy  
Coalition, Indigenous Rights Center, Multicultural Alliance for a Safe Environment, Network  
for Environmental & Economic Responsibility of United Church of Christ, Nevada Nuclear  
Waste Task Force, Nuclear Energy Information Service, Nuclear Issues Study Group, Nuclear  
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NYCD-16 Indivisible Environment Committee, Occupy Bergen County, On Behalf Of Planet  
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Residents for Environmental Safety and Security, National Nuclear Workers for Justice,  
Proposition One Campaign for a Nuclear-Free Future, Public Citizen - Texas, Samuel Lawrence

Foundation, San Luis Obispo Mothers for Peace, Sustainable Energy and Economic Development Coalition, Snake River Alliance, Three Mile Island Alert, Inc., Vermont Yankee Decommissioning Alliance, Western New York Environmental Alliance, and Western NY Peace Center, Inc. hereby propose a significant restructuring of the present plan for public participation in, and public commenting upon, the Draft Environmental Impact Statement of the Holtec International license application for a consolidated interim storage facility (CISF) for spent nuclear fuel (SNF) planned for southeastern New Mexico.

Nine of the undersigned organizations sought leave to intervene in the Holtec adjudicatory proceeding, NRC Docket No. 72-1051. Beyond Nuclear and the Sierra Club were granted intervenor status but were denied intervention because of a supposed lack of an admissible contention, while Don't Waste Michigan, Citizens' Environmental Coalition, Nuclear Energy Information Service, San Luis Obispo Mothers for Peace, Nuclear Issues Study Group, Public Citizen - Texas and Citizens for Alternatives to Chemical Contamination were denied standing entirely.

All of the undersigned organizations hereby request that the Commission indefinitely extend, for the duration of the national COVID-19 pandemic emergency, the ongoing public comment period for the Draft Environmental Impact Statement (DEIS) for the Holtec CISF planned for development in Lea County, New Mexico. At the formal termination of the national emergency as declared by the U.S. Centers for Disease Control (CDC), we request that the public comment period be extended for a period of 199 days. We further request that when in-person hearings again become possible that the NRC conduct plenary-style public hearings in 5 already-proposed cities in New Mexico as well as in each of 18 other cities listed later in this letter.

The undersigned groups seek these changes in the public participation arrangements requests because of the serious present public health emergency, during which much of the American public is beset with concerns of maintaining individual and family health free of the coronavirus. Americans are facing, in unprecedented numbers, sudden dramatic economic reversals and dislocations associated with global recession or even economic depression. Meaningful public participation in the NRC's processing of a license for Holtec and the implementation of procedures under the National Environmental Policy Act (NEPA) is impossible when people and their governments must address crisis-borne difficulties daily. As COVID-19 ravages major population centers and disrupts the health care continuum, it is increasingly unfair to expect citizens to perform needed research and analysis and consultation of experts in order to comment on the Holtec DEIS.

## **1. The Holtec CISF Project Is Unprecedented And Controversial**

Holtec is presently seeking an NRC license for 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 (containing perhaps as much as 8680 metric tons, or MT) of SNF, followed by 19 additional phases of at least 5000 MT each. Holtec plans eventually to store 10,000 canisters containing from 100,000 up to 173,600 MT of SNF at the facility. Even

at 100,000 MT, the CISF would easily be the world's largest SNF aggregation in one place.

Holtec proposes to accept 2.5 times the total volume of SNF planned for entombment at the proposed DOE Yucca Mountain geological repository: potentially 173,600 MT of irradiated nuclear fuel versus 70,000 MT. It follows that Holtec's transport volume, risks, and impacts will be 2.5 times worse than Yucca's. While there may be a temptation to compare Holtec with the failed Private Fuel Services (PFS) project of 15 years ago, Holtec's 173,600 MT volume is more than 4 times PFS's 40,000 MT size. The largely-ignored or under-analyzed transportation effects of Holtec would be fourfold the PFS transportation impacts.

Holtec plans long-term SNF storage for up to 120 years, awaiting completion of a deep geological repository for final SNF disposition.<sup>1</sup> Holtec intends to provide storage services before a repository is built,<sup>2</sup> which if approved by the Commission would comprise a conclusive violation of the Nuclear Waste Policy Act which is likely to continue to be opposed by intervening parties.

It further is questionable whether the facility will operate for less than 120 years. Holtec has asserted that a CIS facility "should have a minimum service life of 300 years."<sup>3</sup> And in 2019, then-Secretary of Energy Rick Perry – former Texas governor – acknowledged the possibility that the proposed Waste Control Specialists (WCS) SNF CISF might *de facto* become the final repository for SNF if a geological repository becomes politically or scientifically impossible. In response to questioning by Rep. Mike Simpson (R-ID) at a House appropriations subcommittee hearing on March 26, 2019, Perry said he and the political leaders of Andrews County, Texas, where the WCS facility would be located, do not object to the WCS CISF becoming a *de facto* permanent SNF disposal site.<sup>4</sup> The acknowledged potential for such a momentous perversion of the interim storage concept, alone, is reason enough to extend the public comment period and its geographic reach to allow extended feedback from people and regions which would have to bear

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<sup>1</sup>From "Environmental Impact Statement for the Holtec International's License Application for a Consolidated Interim Storage Facility for Spent Nuclear Fuel and High Level Waste, Draft Report for Comment" (Holtec DEIS), p. 2-2.

<sup>2</sup>From the "Purpose and Need" rationale, Holtec DEIS p. 2-1: "The proposed Holtec CISF would provide an option for away-from-reactor interim storage of SNF and Greater-Than Class C waste as well as a small quantity of mixed oxide fuel from nuclear power reactors (collectively referred to in this document as SNF), before a permanent repository is available."

<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>

<sup>4</sup>See Perry testimony from 23:30 to 29:30 at <https://www.youtube.com/watch?v=CgtHCsQzffc&feature=youtu.be>

the burden of a different, “forever” mission.

## 2. The Present Public Comment Arrangements Are Grossly Inadequate

The NRC has granted only 60 days for public comment on the Holtec DEIS,<sup>5</sup> which contrasts sharply with the U.S. Department of Energy's (DOE) handling of the DEIS public comment stage on the Yucca Mountain DEIS. DOE accepted comments on the Yucca DEIS for 199 days and convened 23 different public comment hearings in 2001-2002, scattered across the country.

But for Holtec’s CISF – expected to contain, in less secure circumstances, more than twice the SNF volume of Yucca – the NRC has scheduled only five public comment hearings, all exclusively in New Mexico. The DOE convened half a dozen Yucca DEIS public comment meetings in Nevada and nearby parts of California, and held others in a dozen more states along transport corridors through which the SNF would be shipped. Although deliberately excluded from Holtec’s DEIS, the massive nationwide campaign of SNF shipping via barge, Legal Weight Truck (LWT) and rail over literally millions of miles will expose more than 40 of the lower 48 states to significant transport risks identical to those of shipments bound for the Yucca repository.

Besides the New Mexico public hearing sites, the undersigned request that hearings be held at each of these sites, all located along one or more anticipated major SNF transport routes:

Atlanta	Minneapolis/Saint Paul
Boston	Nashville
Chicago	New York/Newark
Cleveland	Omaha
Dallas/Forth Worth	Philadelphia
Detroit	Pittsburgh
San Antonio	San Luis Obispo, CA
Kansas City	St. Louis
Miami	Tampa

The possibility of a spent fuel leak, explosion, criticality or canister breach in any of these urban areas, not to mention routine (incident-free) X-ray-like gamma and neutron radiation emissions during canister transport, surely warrants the scheduling of public comment plenaries in each location. The licensing decision for Holtec requires a process that is much more visible and accessible than at present.

The NRC’s concept of public involvement so far does not match the scale of policy,

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<sup>5</sup>85 Fed. Reg. 16151. (March 20, 2020).

operational and environmental concerns raised by the proposal. There were more than 25,000 public comments submitted at the Holtec CISF scoping stage,<sup>6</sup> over 95% of which were opposed to the plan. That degree of public interest will be eclipsed by the sponsorship of hearings in transportation corridors at greater distances from New Mexico. The NRC's restrictive level of public engagement is grossly inadequate for so ambitious a project.

### 3. NEPA Requires Maximum Public Participation at the DEIS Stage

The NRC's NEPA regulations at 10 C.F.R. § 51.73 require that at least 45 days be allowed for DEIS public comments. Council on Environmental Quality (CEQ) regulations at 40 C.F.R. § 1501.8, however, impose nuanced considerations on the structuring of the comment phase. Section 1501.8 does not "prescribe [ ] universal time limits for the entire NEPA process," but expects agencies to set time limits that are "appropriate to individual actions" and "are consistent with the purposes of NEPA and other essential considerations of national policy." *Id.* The regulation suggests consideration of the following factors when setting time limits in the NEPA process:

- Potential for environmental harm.
  - Size of the proposed action.
  - State of the art of analytic techniques.
  - Degree of public need for the proposed action, including the consequences of delay.
  - Number of persons and agencies affected.
  - Degree to which relevant information is known and if not known the time required for obtaining it.
  - Degree to which the action is controversial.
  - Other time limits imposed on the agency by law, regulations, or executive order.
- 40 C.F.R. § 1501.8(b)(i-viii).

The magnitude of the Holtec project against these factors supports the provision of many public hearings across the country. There is very serious accident potential in hauling SNF by the thousands of cargoes to New Mexico. The largest agglomeration of Spent Nuclear Fuel on the planet will have to be perfectly contained when received, handled, shallow buried, monitored, retrieved, exported and at decommissioning of the Holtec facility. The array of scientific considerations in the DEIS is extensive and may require interested commenters to seek expert interpretation and advice. The development of the Holtec CISF is a national public policy determination for which there are years, available to make the best-informed public

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<sup>6</sup><http://www.beyondnuclear.org/centralized-storage/2018/7/30/coalition-opposed-to-holtecelea-cisf-in-nm-meets-nrc-environ.html> .

Notably, scoping commenting for Holtec was limited to a 60-day period, while for Yucca Mountain, the DOE allowed 120 days. "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. 1-23-24.

determination. While the DEIS excludes serious analysis of transportation impacts from long-distance and transcontinental shipments of SNF, over 200,000,000 people live within 50 miles of a barge, truck or rail route on which the waste will travel.<sup>7</sup> Multiple federal and state agencies are affected and will have a role in regulation or implementation, such as the NRC, DOE, Department of Interior's Bureau of Land Management and its Fish and Wildlife Service, U.S. Department of Transportation's Federal Highway Administration and its Federal Rail Administration, the Army Corps of Engineers, and Department of Homeland Security. Hundreds of state and local utility, transportation, environmental, and emergency preparedness authorities will also be involved, pre-implementation and during operational and decommissioning phases. Given the controversial nature of the project, the foregoing considerations militate in favor of a more geographically inclusive and lengthy DEIS public comment stage than the NRC has committed to do.

#### **4. NRC Discretion to Limit Public Comments Is Constrained**

Congress intended that agency discretion, and not the courts, be used to determine "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). But a reviewing court can overturn an agency decision for failure to provide additional procedure when there are "extremely compelling circumstances." *Vermont Yankee*, 435 U.S. at 543.

Such circumstances are present here, where the DEIS for an enormous undertaking has been published in the midst of an unprecedented national and global public health ordeal. Construction and operation of the Holtec facility demands flawless transportation from locations around the country to the New Mexico destination. At issue is an expensive and long-duration SNF storage site where extraordinarily deadly substances will have to be contained for centuries. 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 accompanied by serious radiation leakage, could be more than the public is willing to accept just to have the waste concentrated in New Mexico.

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<sup>7</sup>In the "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, Volume I" (February 2002), the U.S. Department of Energy pronounced that the "region of influence for public health and safety along existing transportation routes is 800 meters (0.5 mile) from the centerline of the transportation rights-of-way and from the boundary of rail yards for incident-free (non-accident) conditions. The region of influence was extended to 80 kilometers (50 miles) to address potential human health and safety impacts from accident scenarios." §§ 3.2.1, p. 3-119. The spent nuclear fuel bound for the Holtec CISF is identical to the SNF planned for deep repository burial. The Yucca Region of Influence radius of .5 miles for incident-free transports, and 50 miles for accident scenarios can be logically used in public comments about the 10,000 shipments of SNF headed to Holtec. Additionally, all 10,000 canisters delivered to Holtec's CISF would at a later date have to be shipped yet again to a permanent geological repository for permanent disposal.

Perhaps there can be no time when 100% of the interested public can participate at the public comment stage, but that only means that the public's chance to focus on Holtec and participate must be made as convenient and informed as possible. Accordingly, the Holtec licensing process must yield to this historical virus calamity. We thus request that the DEIS public comment opportunity for the Holtec CISF be indefinitely extended from May 22, 2020 through the formal end of the COVID-19 pandemic crisis. We further ask that at that time, the NRC allow 199 additional days for public comment and that the agency also convene scattered hearings proposed in this letter along with the planned New Mexico plenaries.

The undersigned organizations have previously participated in this licensing proceeding as advocates for public health and safety and the environment.

Finally, we ask for an expedited decision from the Commission as to these requests, given the fast-approaching May 22, 2020 deadline.

Thank you very much.

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