Green Party of the Albuquerque Metropolitan Area
(GPAMA)
P. O. Box 40033
Albuquerque, New Mexico 87196

24 July 2018

Jill Caverly
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington DC 20555-0001

Re: NRC-2018-0052-0001, Application for a Consolidated Interim Storage Facility for Spent Nuclear Fuel

Dear Madam:

The most important environmental issues to analyze in detail are potential adverse effects on water, air, land, and wildlife. Risks to historical and cultural sites and economic costs are other factors that should be fully evaluated. Economic costs must include security costs associated with transfer and transportation of spent fuel from all potential source sites, commercial, military, and research. Additionally, as a country, we must question the wisdom of continued use and promotion of an energy source with inherent dangers that must be securely monitored for millennia and across societies.

Vulnerability of the High Plains Aquifer to contamination from canister and cask leakage (requiring a full assessment of containers currently in use for partial- and full-thickness cracks and structural deformities and anomalies), waste disposal from the proposed facility, and flooding must be fully examined. Quantitative projection of water consumption over the lifetime of the proposed facility including analyses of continued baseline consumption of served populations, precipitation forecasts, and water transfers must be provided.

Spread of air-borne contamination in tornado-prone Lea County must be quantitatively modelled for baseline emissions and breaches of the proposed facility. Structural vulnerability of the above ground component of the facility to high velocity winds must be determined. Propagated stress effects to the structural integrity of subsurface storage units must be analyzed.

Historical seismic activity in the Permian Basin must be augmented by the increased risk secondary to hydraulic fracturing and conventional oil extraction techniques in Lea and Eddy Counties in assessing seismic risk to the proposed facility. The Northwest Shelf, Delaware and Central Basins, and Matador Arch must be thoroughly analyzed for seismic risk in the general area of the proposed site.

Wildlife species of the northern Guadalupe Mountains, southern Pecos River watershed, and western Great Plains must be fully assessed for current endangerment, tolerance to radioactive contamination of their nesting and mating areas and migratory routes, and capacity for bio-accumulation of radioactive isotopes. Flora of these areas must be fully assessed for current endangerment, capacity for bio-accumulation of radioactive isotopes, and significance to pollinator species. Carcinogenic potential of any and all spent fuel wastes and associated emissions to humans, pets, and livestock must be fully assessed.

The following alternatives to the proposed Holtec facility should be fully evaluated:

1. Keep casks and spent fuel in pools in place at current locations and vitrify waste on site.
2. Keep casks and spent fuel in pools stay in place and remediate or neutralize waste in the pools. This may involve trials of various experimental techniques will all due precautions taken.
3. Re-evaluate the previously proposed permanent storage site at Yucca Mountain in Nevada.

Thank you,

Green Party of the Albuquerque Metropolitan Area