

April 22, 2020

U.S. Nuclear Regulatory Commission
Office of Administration
Mail Stop: TWFN-7-A60M
Washington, DC 20555-0001

ATTN: Program Management, Announcements and Editing Staff

Subject: Docket ID NRC-2018-0052
American Nuclear Society (ANS) Comments on NUREG-2237,
Environmental Impact Statement for the Holtec International's License
Application for a Consolidated Interim Storage Facility for Spent Nuclear
Fuel and High Level Waste

Dear Sir or Madam:

On behalf of the over 11,000 nuclear technology professionals that makeup the American Nuclear Society (ANS), I am pleased to provide comments on the Nuclear Regulatory Commission's (NRC's) draft environmental impact statement (EIS) for the proposed Holtec Consolidated Interim Storage Facility (CISF) in southeast New Mexico. ANS members are involved in many applications of nuclear technology for the betterment of humanity, including the clean generation of reliable electricity using nuclear power plants. The radioactive by-product of electricity generation, used nuclear fuel (UNF), has been safely stored, primarily on nuclear power plant sites, since the 1950s. Holtec has applied for a license to construct and operate a CISF in New Mexico that would allow collection and storage of UNF in a centralized location rather than numerous locations around the country. The CISF would not obviate the need for a permanent repository for disposal of UNF and high-level radioactive waste, but it would enhance the management of UNF and allow shutdown reactor sites to be fully decommissioned and repurposed for other uses. Thus the Holtec CISF, if approved, constructed, and operated, could be a beneficial component of the country's nuclear waste management system.

The NRC, in its role as regulator of commercial nuclear facilities, evaluated the environmental impacts of the proposed Holtec CISF and documented the results of that evaluation in draft NUREG-2237. ANS offers the following comments on the draft EIS.

General

The EIS provides a thorough evaluation of the environmental impacts of the proposed facility and related actions. ANS agrees with the preliminary NRC staff recommendation for “issuance of a license to Holtec authorizing the initial phase of the project, unless safety issues mandate otherwise” (Abstract, p. iii).

Safety of Used Fuel Storage

The NRC found that CISF impacts to public and occupational health would be “SMALL.” ANS agrees with this finding, and it is supported by the fact that used fuel has been stored safely in the United States and abroad since the 1950s. ANS Position Statement #76 “Interim Storage of Used or Spent Nuclear Fuel” (February 2017) discusses the excellent safety record associated with wet and dry storage of used fuel.

Safety of Used Fuel Transportation

The NRC found that the impacts of transportation of used fuel to the CISF and, eventually, from the CISF to a repository for permanent disposal would be “SMALL.” ANS agrees with this finding, and it is supported by the fact that used fuel has been transported safely in the United States and abroad since the 1950s. ANS Position Statement #18 “The Safety of Transporting Radioactive Materials” (November 2017) discusses the excellent safety record associated with transportation of used fuel.

Benefits of a CISF

Given the current stalemate over permanent disposal of used fuel, development of CISFs such as the proposed Holtec facility would enhance the management of used fuel in the United States. ANS Position Statement #76 states:

Until recycling and/or geologic disposal can be accomplished, ANS also supports the development of consolidated away from reactor interim storage for UNF – in most cases using the same proven technology now deployed at reactor sites. Consolidation could result in a more efficient storage system (as aging management and security capabilities could be combined for a larger number of systems). It would also allow land which is currently being used to store UNF at decommissioned reactors to be returned to surrounding communities for other purposes.

The draft EIS also found that the proposed facility would bring SMALL to MODERATE socioeconomic benefits to the region surrounding the proposed project area (Abstract, p. xli). ANS notes that, as a general matter, nuclear facilities throughout the country provide employment and other economic benefits to their host communities.

Potential Enhancements

ANS offers the NRC the following suggestions for consideration as NUREG-2237 is finalized.

- Executive Summary, p. xlii. Under “Public and Occupational Health” the NRC states “Workers and the public could be exposed to low levels of background radiation or nonradiological emissions during the construction stage.” The statement is repeated in the body of the report (Section 4.13.1.1, p. 4-87). ANS

sees no need to state that people will be exposed to background radiation in this EIS, or any other EIS. It is, in fact, a certainty – workers and the public will be exposed to background radiation. Background radiation is a fact of life and it is not a discriminator among alternatives.

- Executive Summary, p. xliii. Under “Public and Occupational Health,” when discussing operational activities the NRC states “the radiological impacts would include expected occupational and public exposures to low levels of radiation.” The NRC goes on to summarize anticipated occupational exposures but says nothing quantitative about public exposures in the Executive Summary. The reader is left to speculate about doses to the public. In fact, public exposures would be negligible, as discussed in Section 4.13.1.2 (pp. 4-91 and 4-92). Following complete buildout of the facility (40,000 metric tons of used fuel), Holtec conservatively estimated the annual dose to the hypothetical individual who spends 2,000 hours at the facility fencepost to be only 0.122 mSv (12.2 mrem). For a more realistic but still conservative estimate, Holtec calculated an annual dose to a resident who spent the entire year (8,760 hours) 1 km from facility (much closer than any current resident) to be only 0.018 mSv (1.8 mrem). ANS recommends that the NRC address public exposures in more detail in the Executive Summary.
- Executive Summary, p. xlv. Under “Waste Management,” when discussing operational activities the NRC provides quantities of hazardous waste, nonhazardous solid waste, and sanitary waste but mentions low-level radioactive waste (LLRW) only qualitatively. In Section 4.14.1.2 (p. 4-97), the NRC cites the Holtec estimate of 0.45 metric tons per year of LLRW generated at the facility. ANS recommends the NRC provide quantitative information on LLRW in the Executive Summary as well as in the body of the report.

Overall, ANS commends the quality and scope of the draft EIS for the Holtec CISF. If you have any additional questions, or would like further information, please contact Steve Nesbit of the ANS Nuclear Waste Policy Task Force at (704) 578-5817 or steve.nesbit@lmnt-consulting.com.

Respectfully,



Marilyn Kray, President
American Nuclear Society