



SIERRA CLUB

RIO GRANDE CHAPTER

Storage of High Level Nuclear Waste

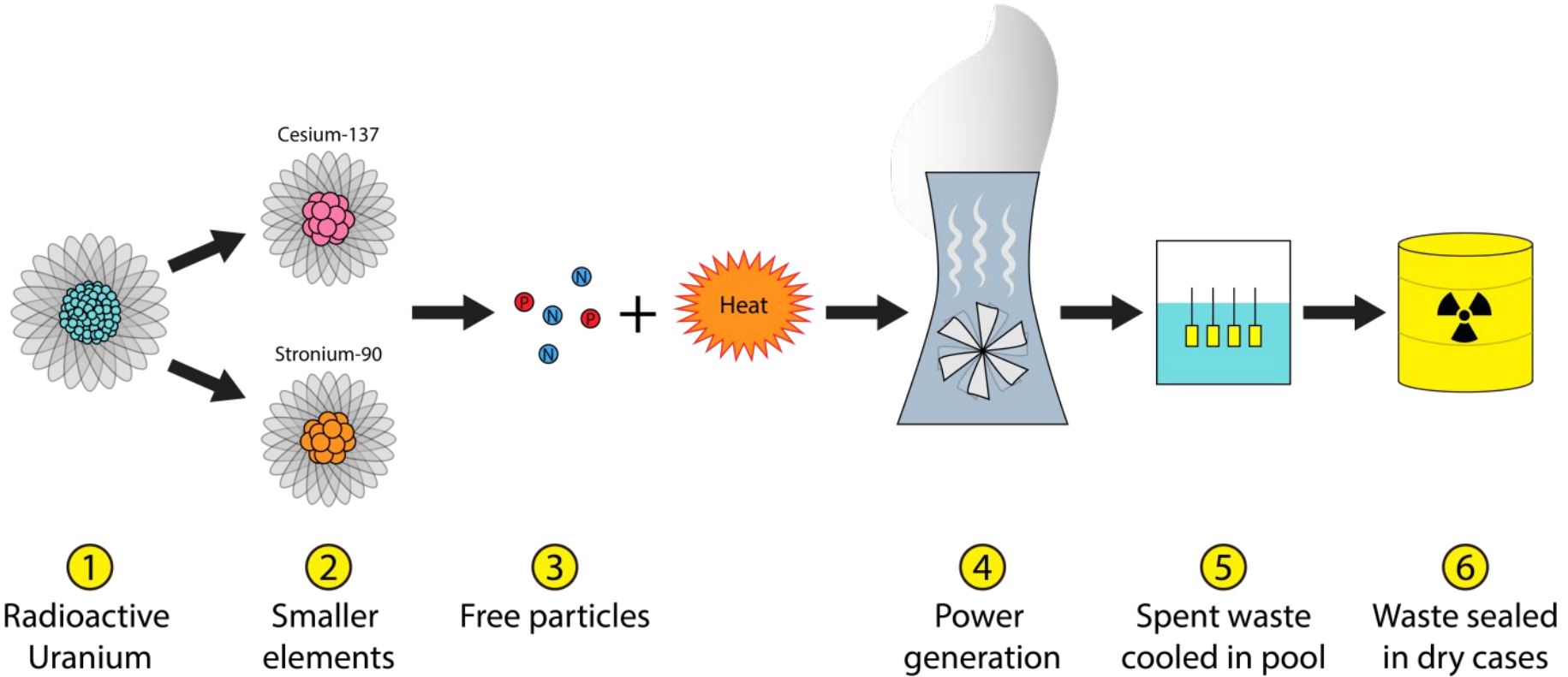
Safest, closest location to its origin

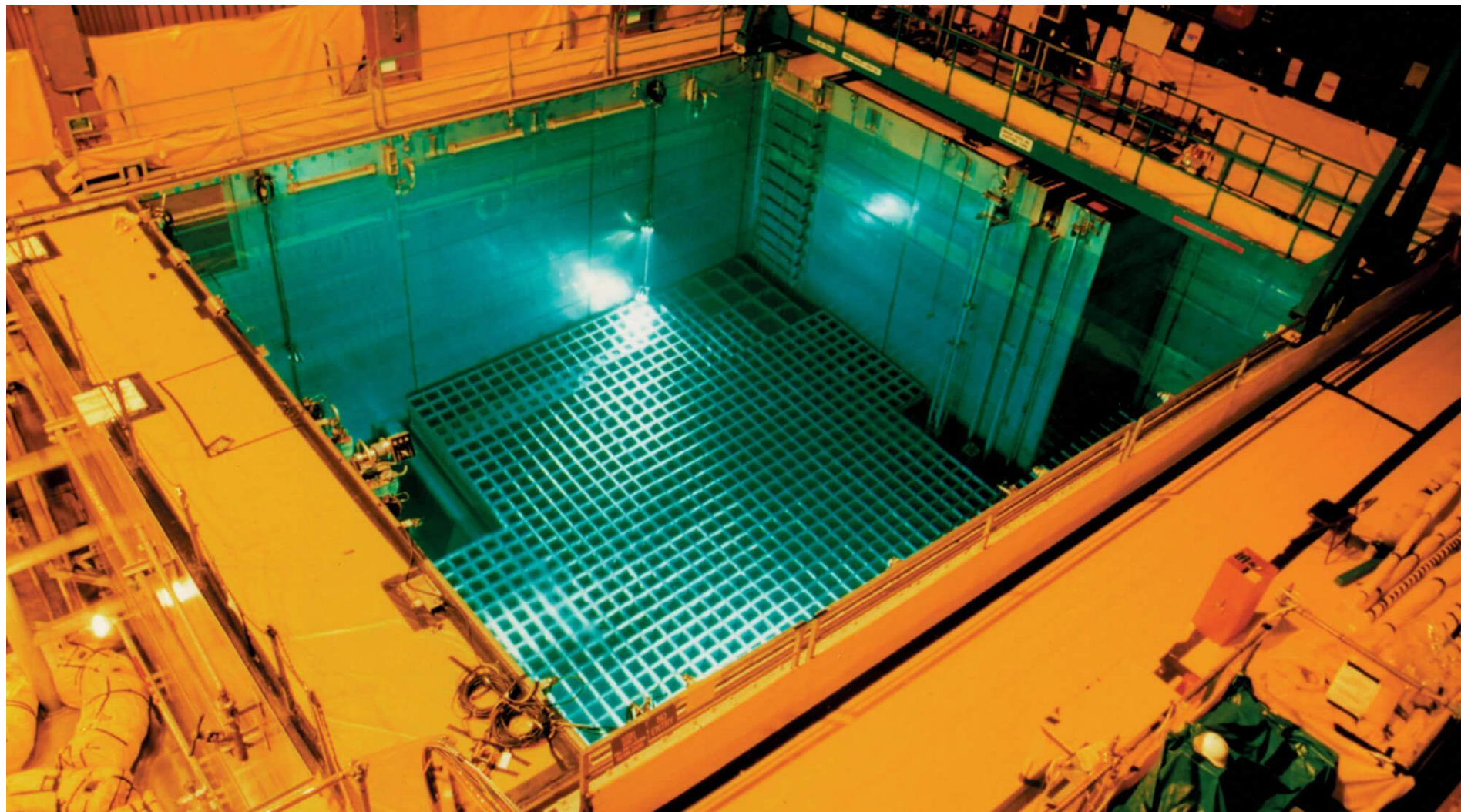
Camilla Feibelman

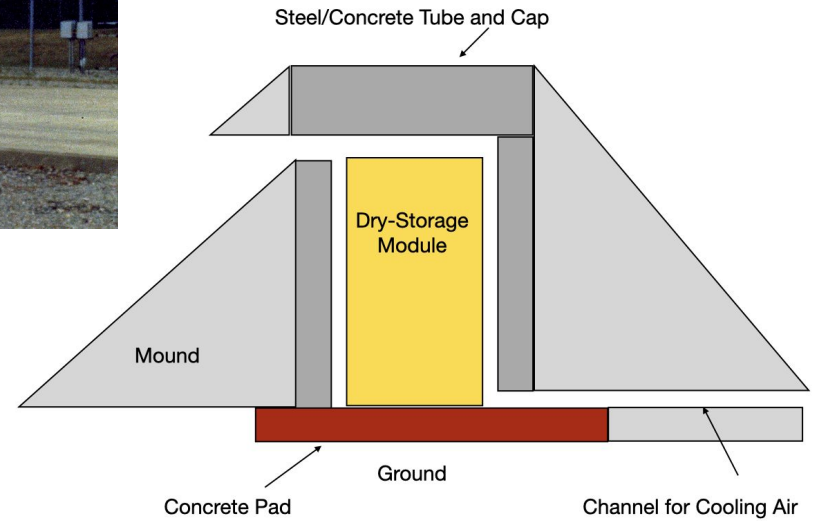
Sierra Club Rio Grande Chapter Director

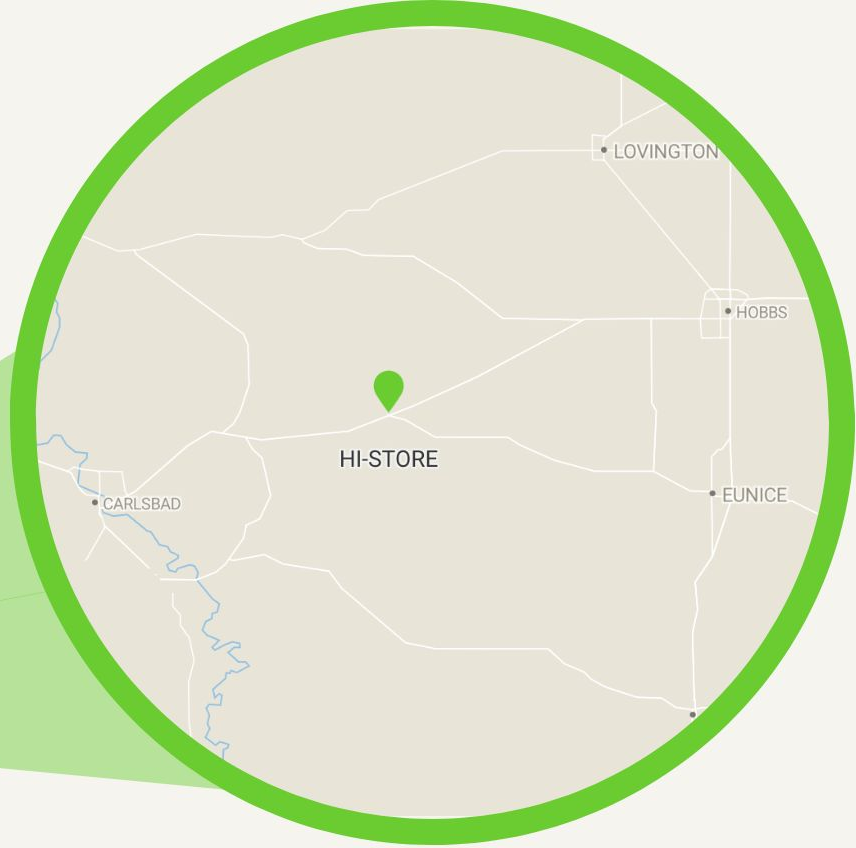
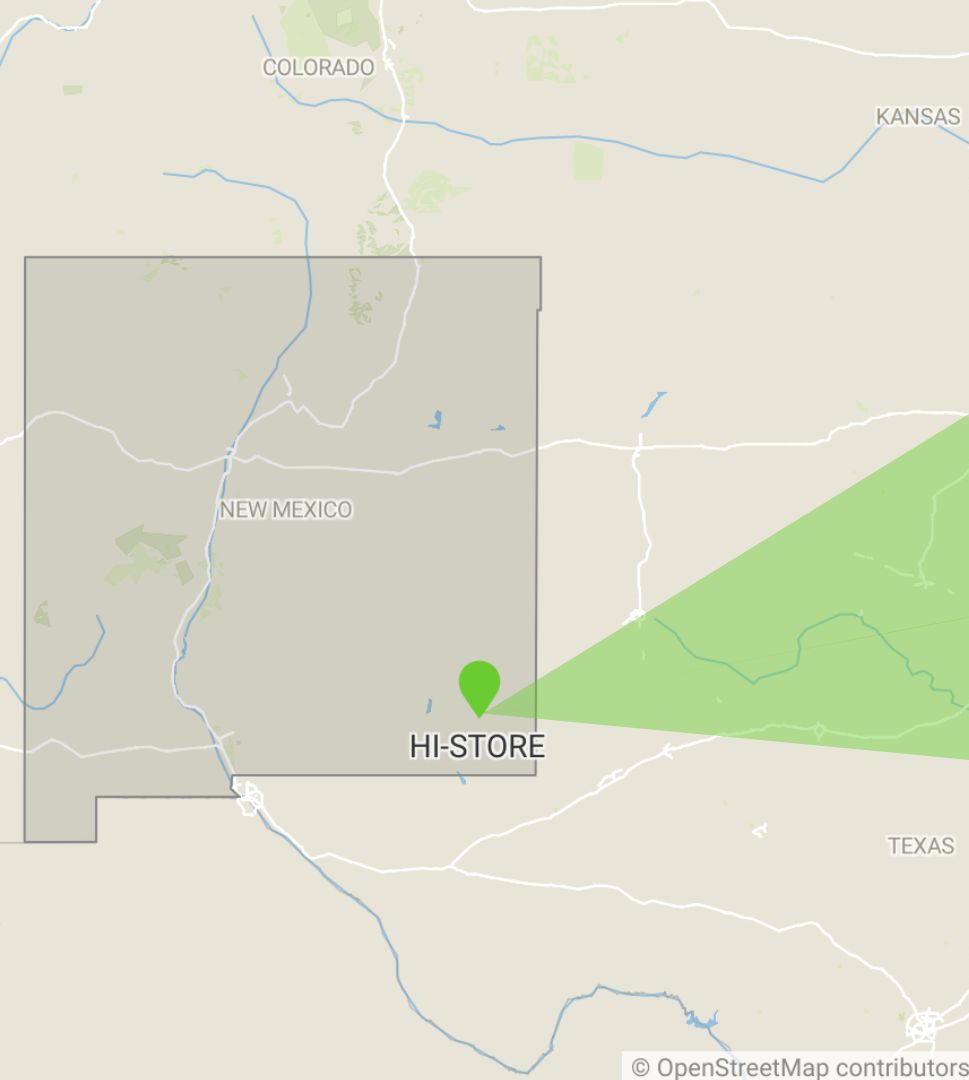
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The Lifecycle of Nuclear Fuel





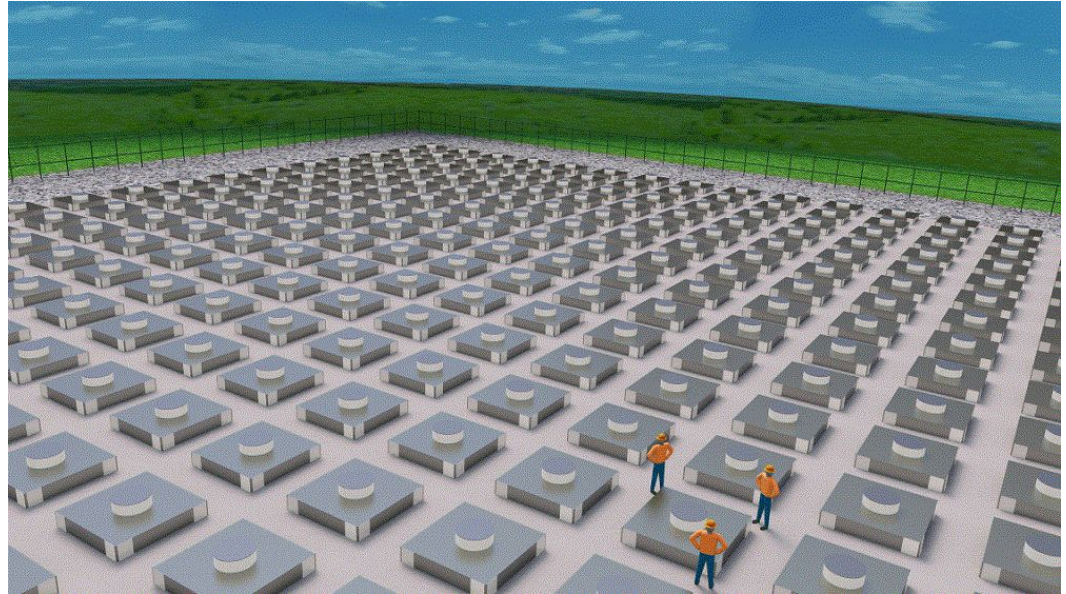




Holtec's HI-STORE Consolidated Interim Storage Facility will be located about halfway between Carlsbad and Hobbs, New Mexico.

1,000 acres between Hobbs and Carlsbad

- Formerly grazing land.
- Surface owned by ELEA, Mineral rights owned by SLO.
- Near 2500 gas wells, 54 companies in a 10 mile radius.



Holtec International

New Mexico Rail Routes



Holtec Proposal

- Bring the nation's high level nuclear waste by truck and rail to southeast NM.
 - Initially up to 8,680 metric tons in 500 casks.
 - Up to 100,000 metric tons in 10,000 casks.
 - Total capacity of 173,600 metric tons.
 - 30 million spent nuclear fuel rods.
 - No capacity for Dry Transfer System, so if a cask is leaking it gets sent back.
 - Stored in underground silos at a depth of 40 feet.

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Holtec will lose millions in storing nuclear waste in New Mexico, whistleblower suit says



Adrian Hedden

Carlsbad Current-Argus

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Profitability

ELEA would earn $\frac{1}{3}$ of the profits. But former CFO says the company has attempted to hide estimated losses of up to \$150M/year over 5 years.

Liability

- NMED doesn't have the budget or staff to oversee the facility.
- Insurance doesn't cover nuclear accidents.
- And local governments would be responsible for rapid response in case of an emergency or terrorist attack.

What should we do instead?

- SNF be stored at the site of origin in the safest manner possible, via dry storage of SNF and hardened on-site storage (HOSS).
- And any new reactors of any size and scale and the communities where they reside should be consenting to long term, onsite storage.
- The federal government must immediately initiate a consent based search for a permanent, geologic storage facility as required by law.

State of Affairs, TX

Interim Storage Partners, Andrews County, Texas Has a Split Decision

- DC circuit court decided against Beyond Nuclear challenge to the NRC license.
- 5th circuit court decided with the State of Texas vacating the NRC license.

State of Affairs, NM

Holtec, Lea County, New Mexico

- Holtec files with the NRC for a permit application.
- SC intervenes, stating why the permit should not be granted.
- Holtec and NRC file answers objecting to our intervention.
- There's a hearing before the NRC Licensing Board which denies our intervention.
- The NRC denies our appeal.
- SC appeals in the DC circuit.
- The NRC issues Holtec a license in May.
- Holtec and NRC will file briefs on Nov 9.
- SC will have until Dec 1 to file our rebuttal.



Main Issues Calling for Denial of License

- The NWPA Prohibits the Licensing of the Proposed CIS Facility.
- Holtec's Material False Statement Precludes Issuance of a License.
- There Are Significant Geologic Impacts From the Holtec Proposal That Were Not Properly Discussed and Evaluated in the Holtec Environmental Report.
- Holtec Grossly Understated the Volume of Low-Level Radioactive Waste That Will Be Generated During the Operational Life of the Holtec Facility.
- The Continued Storage Rule Should Not Be Applied To Exempt the Holtec CISF From Site-Specific NEPA Analysis.
- Holtec's 'Start Clean/Stay Clean' Policy Is Unlawful and Directly Poses a Public Health Threat.
- SNF Transportation Routes Were Inadequately Disclosed.