NEW MEXICO IS NOT THE PLACE FOR THE NATION'S HIGH LEVEL IRRADIATED NUCLEAR POWER WASTE

Two companies are proposing to build waste facilities near Carlsbad and Hobbs for the most toxic and dangerous type of radioactive waste created by the nuclear industry. It is waste generated by nuclear power plants called "high level radioactive waste" (HLRW), also known as "spent" or "irradiated" fuel. This waste contains plutonium, uranium, strontium, and cesium, and will be radioactive for millions of years. It is *not* like the waste currently stored at the Waste Isolation Pilot Project (WIPP) or any other waste site that exists today in the U.S.it is far worse! These proposed waste sites are called Consolidated Interim Storage (CIS). Transport of this waste poses risks to the environment and all life located near transportation routes.

Holtec International is working with the Eddy-Lea Energy Alliance, LLC (ELEA) to apply for a license to build a CIS facility approximately halfway between Carlsbad and Hobbs, and 16 miles north of WIPP. When the Nuclear Regulatory Commission (NRC) declares the Holtec/ELEA application complete, NRC will initiate a public comment period, expected in Spring of 2018, with 60 days to allow for public intervention and 45 days for public comment. Holtec proposal:

- New CIS facility to store 100,000 metric tons of HLRW, with potential to increase to 120,000 metric tons for 120 years
- Shallow sub-surface burial system
- · No on-site repackaging facility.



Above: Southeast New Mexico, Source: holtecinternational.com

Waste Control Specialists (WCS), is working with TN Americas LLC (an Areva subsidiary) and NAC International Inc. to apply for a license to bring HLRW to their existing facility. WCS facility for "low-level" radioactive and hazardous waste treatment and disposal of nuclear power and weapons waste is located near Eunice, across the stateline in Andrews County, TX. Their application was suspended for financial reasons, but could be resumed soon. WCS proposal:

- Existing facility to store 5,000 metric tons of HLRW with potential to expand to 40,000 metric tons
- All train shipments would go through Eunice
- Four Texas counties have said "NO!" to HLRW storage proposals and transport

CONSOLIDATED "INTERIM" STORAGE (CIS)

Consolidated Interim Storage implies that waste would only be held temporarily, until a permanent repository is in operation. A major risk if these sites are approved is that once waste is moved to NM, the storage could become permanent, but the proposed facilities are not being designed for permanent isolation. Currently, liability for the waste produced at nuclear reactors is borne by the generators of that waste. If CIS facilities are built, the costs and liability would shift from the generator to the government and the taxpayer. We would be bearing the burden of the nation's irradiated waste problem and related risks, while there is no commercial nuclear power plant located in New Mexico.

TRANSPORTATION ROUTES ARE UNKNOWN

Transportation would include thousands of routine shipments for 24 years or more on rails, roads, and waterways across the United States.

Routes will not be approved by USDOT and NRC for several years until licensing is complete. We can only predict transportation routes from power plants to CIS sites; however, routes in New Mexico will most likely be by rail.

Furthermore, we will not know exact routes by rail until the actual time of transport when decided by rail companies. The existing railways were not built to withstand the weight of HLRW transport and no plans for new railways or renovation have been announced. Citizens and policymakers need to know exact routes to prepare before any decision to allow radioactive waste storage is made.

CIS is intended to be temporary, so at such a time if a permanent repository is built, the waste from power plants could be moved twice, increasing the total time of transport and related risks. Unless absolutely necessary, HLRW should stay closest to where it was produced to reduce risks of accidents and exposure.

Class I Railroads

NMRX (NMDOT-owned)

BNSF Railway

Union Pacific Railroads

Class II Railroads

Southwestern Railroads

Southwestern Railroads

Southwestern Railroads

Southwestern Railroads

Southwestern Railroads

Southwestern Railroads

Fival Railroads

Antonito

Rail Ranner

Not used by Rail Runner

Not used by Ra

Figure ES.1 New Mexico State Rail System in 2014

Texas-New Mexico Railroad

Arizona Eastern Railway

ISSUES AND RISKS, WHY CIS IS A BAD IDEA

- "Interim" sites could become de facto permanent dumps without meeting the requirements for permanent disposal.
- Waste could be moved from reactors through New Mexico more than once; first, to these CIS sites "temporarily" and then to a permanent repository if opened.
- Transporting high-level radioactive waste increases risks of accidents and terrorism.
- DOE calculated that for transport to Yucca Mountain, train accidents were anticipated at

a rate of 1 in 10,000 shipments. At least one train accident was expected to occur if transport was mainly by train.

Navajo Mine Railroad

Cumbres & Toltec Scenic Railway

 A Department of Energy report found that a severe accident involving one radioactive waste cask releasing only a small amount of waste could contaminate a 42-square mile area, with cleanup costs exceeding \$620M in a rural area. Clean up in an urban area would be time consuming and could cost up to \$9.5B to raze and rebuild the most heavily contaminated square mile.

WE ASK FOR YOUR SUPPORT TO SAY "NO TO CIS!" AND TO SEND NRC YOUR CONCERNS ABOUT TRANSPORT OF HIGH LEVEL RADIOACTIVE WASTE DURING THE UPCOMING COMMENT PERIOD.



Nuclear Issues Study Group Contact: protectnewmexico@gmail.com, 505-879 8547 For more information, visit: www.nuclearnewmexico.com

Sources: nirs.org, NoNuclearWasteAqui.org, holtecinternational.com, wcstexas.com, nrc.gov, doe.gov

Updated: 03/02/2018