



**Green Party of the Albuquerque Metropolitan Area
(GPAMA)
P. O. Box 40033
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Jill Caverly
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington DC 20555-0001

Re: NRC-2018-0052-0001, draft EIS for proposed Consolidated Interim Storage Facility for Spent Nuclear Fuel

The Green Party of the Albuquerque Metro Area (GPAMA) has serious reservations about the draft environmental impact statement issued for the proposed facility in Lea County. Lea County officials are on record as supporting the proposed facility and claim that it is a local issue. However, given the transportation across 129 routes, including many states as well as New Mexico counties, and a history of dubious cask safety, it is definitely a larger safety issue, and not restricted to New Mexico.

The contracting company, Holtec, wants the taxpayers to assume the responsibility for safety risk and wants the federal government to take on transportation to their proposed site. The location of the proposed waste storage plant is in the Permian Basin where much recent drilling for oil and gas has occurred. The drilling (“boreholes”) and its new technologies produce fundamentally unstable conditions which result in future increased accident risks for the new facility. Unanticipated events such as this lead not only to environmental degradation but also to a greater chance of harm to humans. The unproved beneficial economic claims can not counterbalance the negative effects to public health and environmental well-being.

GPAMA recommends that future decisions about the plant take place at the state rather than the county level and that the public have ample chance to offer their comments.