In response to your RFI regarding WCS' application to NRC, please find a letter from the Andrews Chamber of Commerce attached. We look forward to visiting with you when you are in Andrews on February 15.

Thank you,
Julia Wallace

Julia Wallace,
Executive Director
January 27, 2017

To Whom It May Concern
Via email at: PrivateISF@hq.doe.gov

Subject: Response to RFI on Private Initiatives to Develop
Consolidated SNF Storage Facilities

Dear Sir/Madam:

The community of Andrews, Texas (Andrews) is pleased to comment on the U.S. Department of Energy’s “Request for Information (RFI) on Private Initiatives to Develop Consolidated Interim Storage Facilities”. Andrews does not respond point-by-point, but provides the following general response.

An Interim Storage Facility (ISF) as proposed by Waste Control Specialists LLC (WCS) would assist Andrews’ community in meeting several of its goals.

Andrews has a long history of oil and gas production being the primary industry in the county, but its highly cyclical nature drives wages, property tax value, and housing costs up and down when oil prices rise and fall, respectively. Diversification of the economy has long been recognized as very important to the community of Andrews. Industries that are safe, based on sound science, and well-regulated are welcomed. The proposed WCS consolidated ISF meets our community goals.

Andrews also recognizes the benefit of industries that employ higher-paid professionals. These professionals and their families will become long term residents in the community. They have historically become involved in local activities and provided support to the local schools, youth groups, and charity organizations.

Any increase in the property tax base is welcomed to partially offset the volatility of oil prices, which can account for a range of 60% to 90% of local taxes that change in a very short time. Any new construction of facilities or infrastructure related to the ISF would benefit the community of Andrews. Strong consideration should be given to providing payments in lieu of taxes for any tax-exempt government-owned infrastructure.

It is anticipated that an ISF would directly contribute revenue to the community of Andrews similar to that of the existing WCS low-level waste facility. The community has set up the Andrews Legacy Fund to distribute such funding to projects that benefit the community and improve the quality of life of local residents that otherwise may not be funded.

Benefits to the state of Texas from a WCS consolidated ISF would include meeting the state goal of increasing employment and direct revenue similar to that of the existing WCS low-level waste facility.
The community of Andrews has a long and beneficial relationship with WCS, which is highly regulated. We would like to see the same model followed for the ISF. The Department of Energy or other government agencies should limit their involvement to providing appropriate transparent oversight of the construction and operation of the proposed ISF, but they should provide adequate funding to ensure a long term viable business. Based on the proven model of the existing WCS low-level waste facility, no local authorizations or supporting agreements will be needed.

We are comfortable working directly with the PI to ensure information is communicated in a timely and transparent manner. We hope that the information above assists the Department of Energy and allows you to move forward with a private initiative in Andrews County to provide consolidated ISF of spent nuclear fuel.

Sincerely,

Julia Wallace, Executive Director
Andrews Chamber of Commerce