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Secretary US NRC
attn: Rulemaking and adjudications staff:

1952 Palisades Dr.
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Public Comment on RIN 3150-AG20 proposed rulemaking to add amendment #3 to 10 CFR Part 72
VSC-24 Certificate of Compliance and change technical specifications — (revise list of approved spent fuel storage casks)

I know this will be a bit late, but certainly will arrive not totally out of time consideration for the May 21 effectiveness of the rule. I was busy taking care of my 2 yr. old grandson for a week while my new granddaughter was being born. When I got home, I realized this would be late, but simply because I care so much about the future, and how radioactive waste may affect my grandchildren in the future, I still ask that you consider my thoughts here.

Thank you,
Fawn Shillinglaw

Just a few notes of comment:

1. You say it does not reduce the safety margin, but I still ask how you can know this when no VSC-24 cask has been unloaded yet? This continues to be a concern. You talk about "safe confinement", and "storage", but what about unloading of this spent fuel in the distant future? What about transport of this specific fuel after storage? What about disposal of this specific fuel after that? Have you really "brainstormed" all the ramifications

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of replacing minimum pump limitations with minimum boron concentration ??

2. Why haven't you talked with DOE, DOT, NWTRB about this? Other agencies should have input.

3. Long term storage may very well affect fuel in unknown ways. NRC need to evaluate any changes for all previous calculations done in previous acceptance of the VSC-24. Has this been done?

4. You say this change "will not have a significant incremental effect on the quality of the human environment". Are you sure? The environment at storage? Transport? Disposal? This spent fuel has a long environmental future at many different locations.

5. How were unloading specifications revised? Why?

(6.) Do there any residue from more + more boron use expected over storage life? Unloading?

7. When you vacuum dry, is any boron left? If so, what can it do? Have you really evaluated this? Can it stick to fuel rod? Can it clogg basket openings, or drain openings? What havoc in chemical changes can it cause in the future if it remains in that cask during storage?

8. CE 16X16 did not meet existing fuel specifications for the VSC-24. Why not? Is the criticality analysis of LAR-00-01 really all you need to look at? Have you made sure no other chemical reactions in the future from more boron will occur?

(9.) Spent fuel pool water at different sites has a different chemical make up and a different temperature. So will the changes made to — just add "Boron concentration in the MSB cavity water" really be applicable to all sites? Have you considered all the generic evaluations necessary? This is of major importance

10. Is there any difference in types of boron? Have you made this boron type clear in your specifications? What can and cannot be used?

11. Have fabrication leeways in the variations of pellet diameter, cladding thickness, and rod outer diameter been evaluated with 20 years of storage, and unloading effects considered?

12 Have fabrication leeways in fabrication of VSC-24 cask parts been considered? If the pellet, cladding, rod are at minimum (or maximum) and the honeycomb basket spaces or material used are at minimum (or maximum) criteria, how close can you get to getting fuel stuck in there if boron forms a residue? How much space? If rods bend, bow, pellets crack, cladding has pinhole leaks etc?

13. Can the hydrogen formed do anything to the boron? Any gases from spent fuel have effects?

14. Rod pitch seems to be important. Can they be difficult to unload after drying out for 20 years in there?? What is different

about the 16x16 fuel assemblies other than the criticality concern? Are you sure you know all the differences that make you say "no" to storing this before now?

15. You say 14 critical experiments included in NUREG/CR-6361 "Criticality Benchmark Guide for LWR Fuel in Transportation and Storage Packages" was used. What is the date of this NUREG? How old is this data? Is it truly applicable to this amendment? Has the calculation in this NUREG been checked again so it is current?

16. The thing I always worry about is the fabrication mistakes so far. The vendor has not been able to build up any public trust so far, so why should the public accept breaking rule after rule specification now? They haven't even been able to come up with a new coating to eliminate the hydrogen explosion hazard! Why not? NRC asked for that years ago.

Humans make mistakes. Subcontractors have to deal with constantly changing specifications in these cask designs which become less and less "generic". When you get too close to safety margins previously set — and start recalculating everything to get closer and closer to the MSB water boiling etc. — you are asking for future problems.

17. When this cask design was up for initial certification years ago — boron up was a

concern. Burn up should have been figured out before the first C of C was ever issued. But no, Mr. Massy wanted it accepted "as is" and "make changes later". In my mind that makes no sense when public safety risks are concerned. The VSC-24 has been designed, built, and loaded over the years with change after change after change necessitated. Why? Because it wasn't well done in the 1st place! We all know that. As you know, unloading will come one day when our grandchildren are around to pay for it — in money and safety. I sure hope NRC is ready for that day and constantly thinking "un loading" every time you add more and more amendments to these cask certificates. It's time vendors do the job right when they send in a cask design. The rush to get things done in haste has caused a problem every time. You know it has. Don't cause yourself more headache by ever accepting work sent in by a vendor that hasn't considered every aspect of the change. Make them do their homework before you evaluate it. Take your time and keep the public in mind. Our kids and grandkids are depending on your good judgement.

Thank you,

Fawn Shillinglaw