

PUBLIC SUBMISSION

As of: July 13, 2012
Received: July 12, 2012
Status: Pending_Post
Tracking No. 8108b37e
Comments Due: July 13, 2012
Submission Type: Web

Docket: NRC-2012-0108
Spent Fuel Transportation Risk Assessment

Comment On: NRC-2012-0108-0001
Spent Fuel Transportation Risk Assessment

Document: NRC-2012-0108-DRAFT-0003
Comment on FR Doc # 2012-11672

5/14/2012

77 FR 28406

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Government Agency Type: State
Government Agency: Oregon Department of Energy

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2012 JUL 13 AM 9:34

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General Comment

See attached file(s)

Attachments

Oregon Comments on NUREG-2125

SUNSI Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cook (JRCL)



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John A. Kitzhaber, M.D., Governor



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July 13, 2012

Chief, Rulemaking and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop: TWB-05-B01 M
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Thank you for the opportunity to offer comments on the U.S. Nuclear Regulatory Commission's draft Spent Fuel Transportation Risk Assessment (NUREG-2125).

The State of Oregon supports the comments submitted on this report by the Western Interstate Energy Board's High-Level Radioactive Waste Committee on July 13, 2012.

In addition, we have the following comments:

- We strongly recommend that when finalizing this report, that the NRC does not include the Hanford Site as a representative destination for spent fuel shipments. Issues related to the import of waste to Hanford are highly contentious and divisive and can and have interfered with the environmental cleanup that is now in its 24th year. While we recognize Hanford was selected as a representative site to allow for analysis of long-distance routes, identifying it in a manner such as this perpetuates the belief that Hanford should be considered for further waste disposal and storage missions. Hanford is not a suitable location for receipt of spent nuclear fuel from commercial reactors or other waste streams. NRC staff certainly recognized the political sensitivity of not selecting Yucca Mountain as a representative destination. The same considerations should have been made with regards to Hanford.
- While we agree that spent nuclear fuel can be transported safely, we believe many other factors beyond the robustness of the cask must be considered in developing a national transportation safety program for spent nuclear fuel in order to reduce the likelihood of an accident and better address public concerns. The transportation program adopted for shipments of transuranic waste to the Waste Isolation Pilot Plant (WIPP) provides a useful template in developing a spent fuel transportation program. The WIPP transportation program includes, among other things, requirements to ensure highly qualified drivers; rigorous maintenance and inspection of the transport vehicles; provisions to ensure that vehicles are not traveling in hazardous weather conditions;

satellite tracking of the vehicle; and a robust emergency preparedness training and exercise program to ensure emergency responders along the transport corridors are prepared when an accident does occur.

- At the National Transportation Stakeholder's Forum in Knoxville, Tennessee in May, NRC staff indicated that the public and the news media are primary audiences for this document. To that end, we commend the NRC for including Appendix F – “Public Summary,” which is generally well written and easy to understand. However, to make the document even more understandable, scientific notation should not be used. The graphics shown on Pages F-8 and F-9 are also not useful in black and white.
- There is no explanation of why this study was done at this time. Just because the tools are available to conduct a more detailed study does not explain why a decision was made to take a new look at potential spent fuel transportation risks – especially given that they were already calculated to be very low. A compelling explanation of why the new study was conducted at this time should be added.
- The document – especially the Executive Summary and Appendix F – should better reflect risk communication techniques. There are numerous examples within both sections where unlike risks are compared with one another (for example, transport risk versus natural background, and transport risk versus cancer therapy treatment).
- The text on page F-9 refers to an “improbable accident,” and the text on page F-11 states that “if there were an accident during a spent fuel shipment, there is only about a one in a billion chance the accident would result in a release of radioactive materials.” Given recent experiences with Deepwater Horizon and Fukushima, the public has rightly become skeptical about government proclamations of the unlikelihood of a severe accident. The public has clearly seen that severe accidents are very much possible.

If you need clarification of any of our comments, please contact me (503-378-4906, ken.niles@odoc.state.or.us) at your convenience.

Sincerely,



Ken Niles, Administrator
Nuclear Safety and Emergency Preparedness Division