

PUBLIC SUBMISSION

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Consideration on Environmental Impacts on Temporary Storage of Spent Fuel After Cessation of Reactor Operation

Comment On: NRC-2012-0246-0001

Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation

10/25/2012

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Comment on FR Doc # 2012-26295

77 FR 65137

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General Comment

These are my comments extending comments under tracking number ljw-81xx-coie.

Continued:

The NRC uses the concept of generic to limit issues getting a timely and adequate solution. The three specific deficiencies should not be limited to 'generic' issues vs 'site specific' issues. The Court did not limit the issues to generic vs site specific. If there is any importance to an issue, the NRC itself sends a letter to Licensees and resident inspectors to check at their respective sites. This action demonstrates that the division of site specific and generic is artificial and a means to drop an issue into a generic waste basket so it can linger for decades without resolution. This has happened with cable tray separation and many issues.

"when necessary"

When necessary seems to be a generic issue, but 'when necessary' must be evaluated site by site as each site has different physical issues that may produce a different 'when.'

Leaks:

The specific deficiencies point out leaks. I point out that the Limerick NPP has been leaking into the potable water for several years. The residents in the area have gone to the NRC with negative results.

The residents believe that 'when necessary is now. The licensee and the NRC do not agree with the residents. Would the NRC explain what constitutes 'when necessary'?

Some of the issues that I request that the NRC and Licensees address in this rulemaking include

1. Global warming impacts on temporary storage,
2. Methane 'burp' is methane hydrates go to a gaseous state fast enough to cause a world wide explosion,
3. Loss of off-site power die to a cyber attack or a coronal mass ejection.
4. Fuel pool fires that involve oxidation vs substitution energies.

I request that these comments remain open.

SUNSI Review Complete
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Add= S. Lopas (SLL2)

