

# 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

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77 FR 65137

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## General Comment

I am submitting comments early in order to have them considered in a scoping hearing on the 14th of November 2012. I request the right to continue and extend my comments until the close of commenting period on the 2nd of January, 2013. These comments are preliminary and limited due to time. And probably difficult to understand and out of sequence.

The time period mentioned in paragraph II has changed from 30 to 90 years. What is the time period that I am trying to comment upon?

On FR 65138 1st column , Item 1. , "when necessary" is really hard to understand and give numerical values. What time period in years covers when? What are the criteria for necessary? Does a disaster like Fukushima rate a 'necessary' or must it be worse?

Same column Item 2., fires . Does this refer to what? Are these fires from any and all causes or limited to certain fires arising only from fuel stored in a storage facility for a certain number of years or whatever criteria? There does not seem to be any numerical values or years. There is not enough information in the notice to ask reasonable questions.

Paragraph III on column 3 end of 1st Para on the column. What is the difference between a generic issue and a site specific issue. In the past the difference was that an issue that the NRC wanted buried was called generic so that it did not have to be settled in the present proceedings. Is that the criteria?

Item h. bottom of same column. Will commenters be given access to requests for proposals as soon as issued or will we

be required to wait until H freezes over?

Page 65139 item d Thanks for the invitation to participate.

I have raised the issue of single failure criterion with the librarians. They did a good job finding SFC , but could not give me the original citation. May I have the original citation that ordered the NRC staff to ignore any failures beyond the SFC? If the staff must ignore stuff, I think that has generic implications for all hardware and software.

Speaking of softwa

SUNSI Review Complete

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E-RIDS = ADM-03  
Add = S. Lopas (SLL2)