

# PUBLIC SUBMISSION

<b>As of:</b> December 11, 2012
<b>Received:</b> December 10, 2012
<b>Status:</b> Pending_Post
<b>Tracking No.:</b> 1jw-82gj-aur2
<b>Comments Due:</b> January 02, 2013
<b>Submission Type:</b> Web

**Docket:** NRC-2012-0246

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

**Document:** NRC-2012-0246-DRAFT-0133

Comment on FR Doc # 2012-26295

*10/25/2012*  
*77 FR 65137*

*124*

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2012 DEC 11 PM 2: 52

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## General Comment

1• Based on Blue Ribbon Commission (BRC)'s Report, spent nuclear fuel stored in shut down or decommissioned reactor sites may be the first one to transported to consolidated storage and that scenario may bring a few considerations.

o Repackaging need of the spent nuclear fuel – SNFs stored for number of years either in dry or wet storage will be repackaged for transportation or disposal

o Case study for 60 years beyond the licensed life for operation – SNFs stored in shut down or decommissioned reactor sites have been store a couple of decades now and possibly no geologic repository available then these SNFs are going to be stored way beyond 60 years on site. Can this be included in the Environmental Impact study?

2• BRC recommendation 5 states "Prompt efforts to develop one or more consolidated storage facility" and also recommendation 6 states "prompt efforts to prepare for the eventual large-scale transportation of spent nuclear fuel and high-level waste to consolidated storage and disposal facilities when such facilities become available"

o Case study for consolidated storage facility – if BRC recommended consolidated storage facility is available, shouldn't NRC conduct the Environmental Impact study at Consolidated Storage Facility since this will create the need of transportation, repackaging, and other activities?

o Case study for transportation need – SNFs stored in the shut down or decommissioned reactor sites will be moved to consolidated storage facility as soon as available.

3• Consideration for the water in wet storage

o Leakage study – will ground water be tested for any indication of leakage from storage pool at any site?

o Containment – Will water be captured after spent nuclear fuel has been removed from storage? Or will water be drained?

*500 SE Review Complete E-RIDS = ADM-03*  
*Template = ADM-013 Call = S. Lopez (5442)*