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Comment On: NRC-2012-0270-0001
Content Specifications and Shielding Evaluations for Type B Transportation Packages

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General Comment

See attached file(s)

Attachments

NIRS comments on nrc docket 2012-0270 12-28-12

SUNSI Review Complete
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December 28, 2012

RE: Comments on Docket NRC-2012-0270; NRC Regulatory Issue Summary 2012-XX
Content Specification and Shielding Evaluations for Type B Transportation Packages

Nuclear Information and Resource Service (NIRS) has previously made requests for additional time to comment on this draft regulatory issue summary. With 30 additional days, our experts can answer some of the questions raised and make suggestions. Please approve that request.

We have concerns and questions regarding the "clarifications" contained in the Draft Regulatory Issue Summary 2012-XX and their implications for transport of irradiated fuel, transuranics, reactor components and other radioactive materials requiring Type B containers.

What exactly will be the impact on the containerization required for proposed the Bruce Nuclear Steam Generators? Simply lumping all radioactivity in terms of Bq does not account for human health, such as inhalation of Plutonium, for example, much of which is in the Bruce Nuclear Steam Generators.

Will radioactivity be averaged over the entire package? I.e., for steam generators, filled with cement, average radiation over entire container? If so, what protection is there from hotspots?

Internal radioactive concentrations for steam generators are much greater than external. Total radioactivity does not account for presence of alpha such as from Plutonium. Bruce steam generators should be classified as transuranic (TRU) waste, not "Low-Level" radioactive waste. Further, niobium (Nb-94) is also of concern - long-lived and gamma emitter.

Shippers appear to be having a problem with A2 values. Is this the reason for this "clarification?" Steam generators may contain high total radioactivity. How will this "clarification" affect those potential shipments?

If 16 steam generators are sent in one shipment, does one calculate the total radioactivity for one steam generator or for 16?

We continue to oppose the unnecessary shipment of the Bruce Steam Generators to Sweden or any other destination that enables their dispersal into commerce and the marketplace, and unnecessarily puts all shipment routes and those in their vicinity at risk. We oppose changing transport regulations to circumvent the need for international review and approval of special or other unique containerization.

Submitted 12-28-12 by Diane D'Arrigo, NIRS, dianed at nirs.org