

Gallagher, Carol

RULES AND DIRECTIVES
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USNRC

Subject: FW: Comments on spent fuel study

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-----Original Message-----

From: Marv Lewis [mailto:marvlewis@juno.com]

Sent: Thursday, June 27, 2013 3:36 PM

To: RulemakingComments Resource; CHAIRMAN Resource; traci@energyjustice.net; sansunshine@comcast.net; rogerh@energy-net.org; babsjewell@yahoo.com; cindy@beyondnuclear.org; CHAIRMAN Resource; catalyst@actionPa.org; gizmogink@optonline.net; gedward.griffin@verizon.net; Hale, Jerry; kevin@beyondnuclear.org; keberhard@amh.org; michaelbft48@comcast.net; Magnu96196@aol.com; nukenet@energyjustice.net

Subject: Comments on spent fuel study

Nuclear Regulatory Commission

Dear Chairman and Commissioners,

Even Regulations.gov website acts like this is premature as only the draft is presently available. I am pleased to comment on the draft.

There is a problem that I am concerned about. The entire report seems to skirt the issue whether putting spent fuel pools on the roof of a reactor is logical or a design error. I think this issue needs an answer.

Water supply is evaluated only in the proximity of the fuel pool. There are issues of water supply all along the Delaware and Schuylkill Rivers here in PA. I am in touch with the Delaware River Basin Commission whose decisions have been less than exemplary. Ask the farmers about the destruction of one of the best dairy areas in the Northeast without any dam being built after said destruction. (Tocks Island) I shall not go into the rest of a long list.

I applaud the use of color and simple way that seismology is explained. The tables and figures are easily read and understood. The problem emerges in that the graphs and explanation may be an oversimplification. I do not see many 2 sigma and 6 sigma confidence levels on the graphs and figures. If there is any confidence in the figures, data and graphs, the confidence levels should be clearly marked. Is the reader to assume the data is unassailable or to assume there is no confidence in the data?

I shall comment further when the report is placed in the Fed Register.

Respectfully submitted,

Marvin Lewis, R.P.E. (retired)

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