

## Rulemaking1CEm Resource

---

**From:** RulemakingComments Resource  
**Sent:** Tuesday, November 19, 2013 4:04 PM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: High Burn-Up Fuel Issues

**DOCKETED BY USNRC—OFFICE OF THE SECRETARY  
SECY-067**

**PR#:** PR-51  
**FRN#:** 78FR56775  
**NRC DOCKET#:** NRC-2012-0246  
**SECY DOCKET DATE:** 11/14/13  
**TITLE:** Waste Confidence—Continued Storage of Spent Nuclear Fuel  
**COMMENT#:** 00200

**From:** Capt.D [<mailto:captddd@gmail.com>]  
**Sent:** Thursday, November 14, 2013 3:19 PM  
**To:** CHAIRMAN Resource  
**Cc:** Camper, Larry  
**Subject:** High Burn-Up Fuel Issues

Please forward this info to the Waste Confidence people:

Article from *Power Engineering*:

### Briefer on the DOE's High Burn-Up Used Fuel Demonstration Project

<http://www.power-eng.com/articles/npi/print/volume-6/issue-5/departments/nuclear-world/briefer-on-the-doe-s-high-burn-up-used-fuel-demonstration-project.html>

The NRC should not be allowing the industry to use (and make more of) this type of high burn-up fuel when they do not have either the safe long term storage or the safe transportation of it figured out yet!

*"Since the 1990s, almost all used fuel being removed from the reactors have burn-ups in excess of 45 to 50 GWd/MTU. This is considerably higher than the burn-up of the PWR assemblies in the initial demos at INL. The higher burn-ups have generated regulatory interest regarding the ability of used fuel that has undergone prolonged storage to remain intact during transportation; there are some concerns that high burn-up fuel could become critical after a transportation accident."*

In truth, the NRC Waste Confidence environmental impact statement cannot hope to comment on these issue since the potential answers are not even known.

The NRC has placed its own safety employees in a catch-22 situation because they allowed the nuclear industry to promote the use of high burn-up fuel before the safe transportation and long term storage were ever considered, in fact until recently the public did not even know that high burn-up fuel was even in use **since the 1990's**, much less that it required much longer cool down periods after being in use which will surely increase the nuclear "footprint" of nuclear waste located at all NPP using high burn-up fuel!

Thank You  
Don Leichtling  
DAB Safety Team

**Hearing Identifier:** Secy\_RuleMaking\_comments\_Public  
**Email Number:** 213

**Mail Envelope Properties** (377CB97DD54F0F4FAAC7E9FD88BCA6D00127B3A5AF19)

**Subject:** FW: High Burn-Up Fuel Issues  
**Sent Date:** 11/19/2013 4:03:44 PM  
**Received Date:** 11/19/2013 4:04:05 PM  
**From:** RulemakingComments Resource

**Created By:** RulemakingComments.Resource@nrc.gov

**Recipients:**  
"Rulemaking1CEM Resource" <Rulemaking1CEM.Resource@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	2199	11/19/2013 4:04:05 PM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**