

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Monday, November 25, 2013 10:51 AM
To: Rulemaking1CEm Resource
Subject: FW: Extended Storage of Spent Nuclear Fuel

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TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel

COMMENT#: 00238

From: Fred Frank [<mailto:pff9@sbcglobal.net>]
Sent: Wednesday, November 20, 2013 6:06 PM
To: RulemakingComments Resource
Subject: Extended Storage of Spent Nuclear Fuel

Rulemaking and Adjudications Staff:

Thank you for coming to San Luis Obispo and soliciting comments from citizens near the Diablo Canyon Nuclear Power Plant (DCNPP.)

It is important that the Nuclear Regulatory Commission hear from the people most at risk in the case of a radiation release from the plant.

I have been concerned about the storage of nuclear waste at the DCNPP since before retirement I was the County Fire Chief in charge of emergency response to the plant. I also served on the County Nuclear Waste Management Committee chaired by a member of the Board Of Supervisors .

The draft Waste Confidence Generic EIS is a troubling euphemism.We here in San Luis Obispo, feel risk not confidence.

We feel there is unacceptable risk for several reasons:

- 1) A generic rule is inappropriate for the DCNPP because of unknown seismic risks.The plant is located on a web of known and perhaps unknown faults.The plant is now being operated under questionable seismic assumptions.
- 2) The spent fuel pools now contain over 1800 assemblies, many times the original design.The EIS stated that dry storage was the option of choice for safe storage but cost concerns dictated pools storage.
- 3) About 80% of the fuel stored in the pools are high burnup assemblies prone to cladding failure.
- 4) An accident, beyond design basis earthquake or terrorist attack could release orders of magnitude more radiation from the pools than from dry the casks.
- 5) All spent fuel will need to be moved to dry casks anyway, so the cost of early transfer will be offset to some degree, even if high burnup fuel dictate fewer assemblies per cask .

Considering the above we feel that cost should not override safety and the NRC must rule that spent fuel assemblies be transferred from the pools to dry casks as soon as possible regardless of cost.

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