

PUBLIC SUBMISSION

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List of Approved Spent Fuel Storage Casks - Holtec International HI-STORM 100 Cask System, Revision 9

Comment On: NRC-2012-0052-0002

List of Approved Spent Fuel Storage Casks: HI-STORM 100 Cask System; Amendment No. 9

Document: NRC-2012-0052-DRAFT-0007

Comment on FR Doc # 2013-29160

Submitter Information

Name: Ron Rodarte

Address:

38 B Corniche Drive
Dana Point, CA, 92629

Email: rrodarte@cox.net

General Comment

Fuels with a burnup above 45 GWd/tU cause previously unforeseen safety problems and would break existing NRC safety rules 120kb pdf unless changes are made to the way fuel elements are packaged.

Sources: <http://www.nrc.gov/public-involve/conference-symposia/ric/past/2006/slides/t1bc-clifford.pdf>

Sources: <http://www.nrc.gov/public-involve/conference-symposia/ric/past/2008/slides/billone.pdf>

Sources: <https://www.hsd1.org/?view&did=739345>

Most US Nuclear plants have high burnup spent fuel exceeding 60 GWt/MTU, while safety issues begin at above 45GWt/tU. These issues have been ignored and remedial action defunded.

Sources: <http://sanonofresafety.files.wordpress.com/2013/06/ml011380085-1998-07-06memotocommissionerscontinuehighburnup.pdf>

A Senior Materials Scientist in the NRC's Division of Spent Fuel Storage & Transportation, Dr. Robert E. Einziger, states that the NRC has insufficient data to support a licensing position on high burnup cask storage.

Sources: <http://www.nrc.gov/public-involve/conference-symposia/ric/past/2013/docs/abstracts/einzigerv2-06memotocommissionerscontinuehighburnup.pdf>

Sources: <http://www.nrc.gov/public-involve/conference-symposia/ric/past/2013/docs/abstracts/sessionabstract->

24.html

While there is no transportation cask approved for storage or transport, GAO reports accumulations of high burnup spent fuel continue to accrue on site across the nation and pose a threat to life and property if an occurrence of radiation release.

Source: <http://pbadupws.nrc.gov/docs/ML1212/ML12125A218.pdf>

Source: <http://www.gao.gov/assets/600/593745.pdf>

The official NRC website is not functioning properly today and continues to reject commentary with rejection by special characters not allowed in the commentary, even when plain text is used with no links or special characters.

Ron Rodarte December 12, 2013 14:08 hours Dana Point, CA 92629 Pacific West Coast Time