

RulemakingComments Resource

From: Brian Paddock <bpaddock@twlakes.net>
Sent: Thursday, October 09, 2014 12:32 PM
To: RulemakingComments Resource
Cc: Axel C Ringe - TN Sierra Club; Scott Banbury - TN Sierra - Memphis; Don Safer -- Know Nukes & TEC; Mary Olson - NIRS; CHAIRMAN Resource
Subject: Docket ID NRC-2014-0120 Holtec International HI-STORM , Underground, Maximum Capacity Canister Storage System, CoC No. 1040

The Tennessee Chapter of the Sierra Club supports the comments offered by Donna Gilmore <dgilmore@cox.net>.

Holtec has two contracts with TVA for cask storage, one at the Watts Bar 1 and 2 site and one at the Sequoyah 1 & 2. These reactors and the handling and storage of high level waste directly affected our membership who live nearby the reactors and the Holtec cask storage operations. In fact a large number of our members live within the 50 mile affected radii which overlap and both of which include Chattanooga TN.

The Design Basis of the Watts Bar 2 reactor (not yet licensed for operation) intends that safe shut down could occur if there were a flood event that delivered 13 1/2 feet of water at the reactor buildings.

This means that the cask waste storage in an adjacent area would have equal or greater flooding.

We object to your position that the approval of the Holtec underground system should be done in disregard of all the factors listed in Ms.

Gilmore's comments.

With WB2 not yet licensed and the reactor and cask storage site not yet full evaluated and protected from flooding we oppose this approval without any consideration of site specific conditions. This is particularly important and objectionable when associated with a reactor which TVA projects will operate for 60 years and which TVA will have to maintain cask storage for hundreds of years into the future under the newly adopted waste containment rules. Moreover TVA has only a small fraction of the costs of decommissionings set aside for its currently operating reactors and no reserves for hundreds of years of cask storage security, maintenance, transfers or unintended releases.

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