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Southern California Edison Company; San Onofre Nuclear Generating Station, Units 2 and 3

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Southern California Edison Company; San Onofre Nuclear Generating Station, Units 2 and 3; Post-Shutdown Decommissioning Activities Report

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Submitter Information

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General Comment

Southern California Edison Company; San Onofre Nuclear Generating Station, Units 2 and 3
Docket ID: NRC-2014-0223 Agency: Nuclear Regulatory Commission (NRC)

The need to remove San Onofre's spent fuel into dry cask is immediately urgent due to earthquake risk. The spent fuel pools should be immediately reenforced to reflect the higher level of earthquake risk found by the USGS in 2008, compared to 2002. Some solution should be found to seiche, such as a fuel pool cover.

I protest your choice of a dry cask which is less than one inch thick. The surrounding concrete is an unacceptable substitute for a thicker cask. Concrete is subject to degradation from humidity- especially below ground- and risk of cracking due to ground shifts and earthquakes. All underground structures leak by definition. Broken concrete can break through such a thin containment. All of these processes are further exacerbated by radiation induced embrittlement. The casks must be monitored and retrievable.

Unlike some who have written you, I find the idea of using thick cast iron a poor choice both for safety and environmentally. This iron will rust and is subject to brittle fracture, which is why it is no longer approved in the US.

There needs to be an appropriate high resistance alloyed metal but much thicker than one inch! Multiple layers of alloy which combined are at least 5 inches thick is more appropriate.

I further protest your apparent conclusions that a radiation exposure of 1850 mSv due to dry cask failure is acceptable within one mile of the incident - meaning that 18.5 out of 100 people will get a solid tumor or

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leukemia, and that you think that 50 to 500 mSv is acceptable for those outside of the perimeter leading to a 1 in 200 or 5 in 100 getting a solid tumor or leukemia. This is apparently why you are willing to use this thin cask system. This doesn't just influence California but all of the USA. This exposure damage is accumulative over a lifetime, and often bioaccumulative, so the risk is actually higher than these figures reported by the National Academy of Science BEIR report.

I protest the NRC concept that radiation leakage is acceptable. It is not.

I protest your having ignored the increased risk of earthquake, established by the USGS in 2008, at already high risk San Onofre (and Diablo Canyon and Columbia NGS). The increased offshore risk can lead to a near coast Tsunami with no warning at all.

If you continue to fail the American people, then I will move heaven and earth to make sure that you are fired and the worse than worthless NRC shut down.