

PUBLIC SUBMISSION

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| As of: 3/16/15 2:39 PM Received: March 09, 2015 Status: Pending_Post Tracking No. 1jz-8hmg-fu5y Comments Due: March 09, 2015 Submission Type: API |
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Docket: NRC-2014-0233

List of Approved Spent Fuel Storage Casks - Holtec International HI-STORM 100 Cask System, Amendment No. 8, Revision 1

Comment On: NRC-2014-0233-0001

List of Approved Spent Fuel Storage Casks: Holtec International HI-STORM 100 Cask System, Certificate of Compliance No. 1014, Amendment No. 8, Revision No. 1

Document: NRC-2014-0233-DRAFT-0011

Comment on FR Doc # 2015-02310

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General Comment

I am writing to register an adverse comment to the NRC's proposed spent fuel rule NRC-2014-0233. I live in the shadow of the Indian Point nuclear plant, where spent fuel buildup is of great concern to residents and poses a significant threat to public health and safety. The spent fuel buildup at Indian Point is among the highest concentrations of radioactivity on the planet.

The proposed new rule change, amendment 8, revision 1, would require "boiling water reactor fuel affected by certain corrosion mechanisms with specific guidelines to be classified as undamaged fuel."

This amounts to a blanket exception to existing regulations on damaged fuel, as the alternative described in your document is that "interested licensees would have to prepare, and the NRC would have to review, a separate exemption request, thereby increasing the administrative burden on the NRC and the cost to each licensee."

I object strongly to giving out blanket exemptions to regulations on the handling of spent fuel in order to reduce costs for the plant owner or to reduce the NRC's workload. Meeting the highest standards for spent fuel safety is mission-critical for the NRC, and for public health and safety.

The document you provided on the proposed rule change does not explain what it means by "certain corrosion

mechanisms with specific guidelines." At a minimum the NRC needs to explain publicly and clearly for the general public what those guidelines and mechanisms are which would be superseded by the new rule, and allow plenty of time for the public to absorb the information and comment on it. Since that hasn't happened, I'll base my comment on the information I do have.

Here is a recent oped in The Journal News on spent fuel safety at Indian Point:

<http://www.lohud.com/story/opinion/contributors/2014/11/22/yucca-mountain-spent-nuclear-fuel-storage-stall-shut-indian-point/19288749/>

It has salient, sourced facts about how lethal spent fuel rods are, and about how the US has more of them than any other nation. Exempting plant owners from existing safe handling and storage requirements to save them money, and save the NRC work, will draw widespread committed opposition from residents once they know about it, which is why the NRC needs to seek much more robust public input on this rule change.

Without a geologic repository, we need the most robust possible onsite storage possible for spent fuel, not blanket exemptions to treat damaged rods as undamaged. And since we lack adequate means to safely handle and store spent fuel while it builds up on site, the remedy is not to dumb down the definition of "safe" or "adequate;" it's closing aging reactors like Indian Point to stop compounding this grave problem by making more lethal spent fuel.