

# PUBLIC SUBMISSION

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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

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Comment on FR Doc # 2015-02310

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## General Comment

I am in agreement with the following statement by a friend and colleague of mine from Putnam County, NY. I live 20 miles from Indian Point.

"I am writing to register an adverse comment to the NRC's proposed spent fuel rule NRC-2014-0233. I live 14 miles from the Indian Point nuclear plant, where spent fuel buildup 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.

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

"The NRC needs to explain publicly and clearly for the general public what the guidelines and mechanisms are which would be superseded by the new rule, and allow plenty of time for the public to absorb the information and comment on it.

"Regarding spent fuel safety at Indian Point, spent fuel rods are lethal, and 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 is outrageous and goes completely against the NRCs stated (but not followed) mandate that their highest priority is public health and safety.

"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."