

# PUBLIC SUBMISSION

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**Docket:** NRC-2014-0275

List of Approved Spent Fuel Storage Casks - Holtec International HI-STORM Flood/Wind Cask System, Amendment 1, Revision 1

**Comment On:** NRC-2014-0275-0001

List of Approved Spent Fuel Storage Casks: Holtec HI-STORM Flood/Wind System; Certificate of Compliance No. 1032, Amendment No. 1, Revision 1

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Comment on ID: NRC-2014-0275-0001 (Proposed Rule: List of Approved Spent Fuel Storage Casks: Holtec HI-STORM Flood/Wind System; Certificate of Compliance No. 1032, Amendment No. 1, Revision 1)

It is inaccurate to call this "Certificate of Compliance", whereas it is a Certificate of Non-Compliance. Non-Compliance with ASME or any other quality and safety standards. Amending these certificates is fraud.

You state that On July 31, 2013, Holtec submitted a revision request for the Holtec HI-STORM FW System CoC No. 1032, Amendment No. 1 Amendment No. 1, Revision 1, also removes fabrication testing requirements for the thermal expansion coefficient and thermal conductivity of Metamic HT neutron-absorbing structural material. The reason which you give is as these properties have little variability in this aluminum alloy when fabricated according to the manufacturers manual." The NRC has really outdone itself here for sheer unmitigated almost laughable stupidity. You are by now an embarrassment not only to America but to the human race. The heights of your stupidity would really be hysterically funny if you were not trying to exterminate America with your criminal actions.

What do you think that testing is for? The entire point of testing is to verify that the materials, the product, has been made according to the "manufacturer's manual", otherwise known as specifications! Are you that imbecilic or you think everyone else is? The material defects recently found in Areva's new reactor pressure vessel, in France, are proof of the need for testing, and of its importance. Furthermore, the purpose of Metamic is its thermal conductivity and neutron absorbing capacity, which may or may not compensate for its corrosive potential. So, it must be made correctly or not included at all.

You also have thrown in the insane request of restricting the circulation for cooling of the waste. Does your stupidity know no bounds? Why do you continue to whittle away the safety when there are already so many unknowns about containment of nuclear waste, and what is known is alarming.

Once Holtec has been given its certification there should be no "exemptions". Instead, you have been giving out "exemptions" for years. Giving these exemptions is fraud. It is all the more fraudulent as you send them through every month or every few months, diminishing safety in the already flimsy cheap casks, and give only one month to comment.

Another of your kickers is that if the NRC doesn't give a blanket exemption then the NRC will have administrative burden and the licensee have additional costs! You even have the unmitigated gall to say that this increases environmental impact, all while you try to create a catastrophic nuclear accident in the form of a failed Holtec waste cask! Consequently, any 10 CFR part 72 general licensee that seeks to load spent nuclear fuel into the Holtec HI-STORM FW System in accordance with the changes described in proposed Amendment No. 1, Revision 1, would have to request an exemption from the requirements of 10 CFR 72.212 and 72.214. Under this alternative, interested licensees would have to prepare, and the NRC would have to review, each separate exemption request, thereby increasing the administrative burden upon the NRC and the costs to each licensee. Therefore, the environmental impacts of the alternative to the action would be the same or more than the impacts of the action. So, go home then, since you don't want to work. And, may God hurry up and strike you down