# PUBLIC SUBMISSION



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**Docket:** NRC-2014-0273
Impact of Variation in Environmental Conditions on the Thermal Performance of Dry Storage Casks

**Comment On:** NRC-2014-0273-0001
Impact of Variation in Environmental Conditions on the Thermal Performance of Dry Storage Casks

**Document:** NRC-2014-0273-DRAFT-0004
Comment on FR Doc # 2015-05098

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## Submitter Information

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## General Comment

Impact of Variation in Environmental Conditions on the Thermal Performance of Dry Storage Casks, NUREG, US NRC comment deadline MAY 4th-Nuclear Waste Dry Cask Storage Temperature, etc. http://www.regulations.gov/#!documentDetail;D=NRC-2014-0273-0001 ID: NRC-2014-0273-0001

A few questions:

Under what environmental waste storage guidance is averaging allowed in storage of chemical or other toxic waste (NRC, USEPA, USDA)? There are variables - some materials can withstand high heat for days on end without transformation.

Nuclear waste is not a material that can withstand prolonged periods of high temperatures (exceeding small thermal margins) without compositional changes occurring.

How will handlers compensate for summer time periods of prolonged heat exceeding "acceptable" temperatures? At what point do monitoring personnel decide risk exists due to prolonged hours of excessive heat? What response plans are in place for managing high temperature days to avoid peak cladding temperatures?

Please explain assumptions leading to decisions about averaging temperatures. Thank you.

**SUNSI Review Complete**
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