

PR-72  
80FR20171

# PUBLIC SUBMISSION

<b>As of:</b> 5/26/15 4:40 PM <b>Received:</b> May 15, 2015 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1jz-8iva-s49a <b>Comments Due:</b> May 15, 2015 <b>Submission Type:</b> Web
--

**Docket:** NRC-2014-0261

List of Approved Spent Fuel Storage Casks - NAC International MAGNASTOR Cask System, Amendment 5

**Comment On:** NRC-2014-0261-0002

List of Approved Spent Fuel Storage Casks: NAC International, Inc., MAGNASTOR System; Certificate of Compliance No. 1031, Amendment No. 5

**Document:** NRC-2014-0261-DRAFT-0005

Comment on FR Doc # 2015-08677

## Submitter Information

**Name:** anonymous anonymous

## General Comment

List of Approved Spent Fuel Storage Casks - NAC International MAGNASTOR Cask System, Amendment 5

Docket ID: NRC-2014-0261-0002

RIN: 3150-AJ50

It is unacceptable and unnecessary to increase dry cask exposure. You need to be decreasing exposure instead of increasing by 26%. 120 mrem per hour gives whoever or whatever is around the dry cask for one year over 100% chance of cancer or leukemia, according to BEIR. That is 24/7 but even with less exposure this is cancer in a very few years. The 450 mrem per hour on top is obviously worse. It appears impossible to have this high amount on top and not surrounding it. This is 120 mrem on the sides and 450 mrem on top per hour! This is neither ALARA nor as low as achievable. It impacts not just people, but also animals and birds. A chain link fence is not enough protection to keep people out either.

You have to count ALL casks together and not just one, as you appear to be doing based on NUREG 1536 and the wild variations in cask emissions which always conveniently add up to what you want it to (i.e. your alleged "safe" level) at the fence line:

"To demonstrate applicant compliance with these requirements, the NRC staff has accepted calculations in the SAR showing a dose rate less than 0.25 mSv/yr (25 mrem/yr) from one cask (or a representative array of casks) at an assumed distance to the controlled area boundary. Such calculations, in practice, can give only a general assessment of the proposed cask system. In addition to unknown information about the ISFSI itself, the implied assumption that an individual would be at the controlled area boundary for 8760 hours (the entire year) is very conservative.

If the above dose rate criteria are satisfied, NRC accepts that the direct-dose regulatory requirements can also be

satisfied, although the exact details needed to comply with these limitations will vary from site to site. Therefore, the SAR needs to address such requirements only in general terms. Detailed calculations need not be presented if SAR Section 12, "Operating Controls and Limits," assigns ultimate compliance responsibilities to the site licensee. " <http://www.nrc.gov/NRC/NUREGS/SR1536/sr1536.html> 11/29/99

If the above 1999 rule is no longer in place you have clearly made something worse or you would not be able to ok this increase in mrem.

#### BOLLARDS ARE NOT ACCEPTABLE-MAY PUNCTURE HOLES

It is unacceptable that you use bollards to replace real earthquake proof engineering. Bollards may puncture holes in the dry casks. If already filled casks need support then come up with an intelligent way to earthquake proof them with anchors, dampers, or whatever would be the serious way. Make all new casks earthquake proof, for the maximum earthquake anywhere.

Make monitored bunker housing to help with earthquake proofing, protect from heat, and protect the public and animals-birds from the radiation.

Stop playing or being stupid. Make Hitachi-Zosen come up with an intelligent solution. This solution would not be accepted in Japan.