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# PUBLIC SUBMISSION

**Docket:** NRC-2015-0134

List of Approved Spent Fuel Storage Casks - Holtec International HI-STORM Flood/Wind Storage Cask System, Amendment 0, Revision 1

**Comment On:** NRC-2015-0134-0001

List of Approved Spent Fuel Storage Casks: Holtec International, HI-STORM Flood/Wind Multipurpose Storage System, Certificate of Compliance No. 1032, Amendment No. 0, Revision 1; Direct Final Rule

**Document:** NRC-2015-0134-DRAFT-0012

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## Submitter Information

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## General Comment

"NRC-2015-0134 List of Approved Spent Fuel Storage Casks: Holtec International, HI-STORM Flood/Wind Multipurpose Storage System, Certificate of Compliance No. 1032, Amendment No. 0, Revision No. 1 Direct Final Rule 10/28/2015"

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The law requires passive cooling of Spent Fuel Storage Casks. The vents are disproportionately small for such large casks, and poorly located. Vents should be totally unblocked to be considered operable. 50% blocked is unacceptable regardless of temperature. Temperature can change rapidly.

And, if the vents are 50% or more blocked, then they need to be unblocked immediately and not 'N/A' for non-applicable. What's this if it's not operable within 24 hours (or is it more - your text isn't clear) that the MPC should be moved to a transfer cask? Where are you transferring it to? A sealed, thicker transport cask? Why are you checking for radiation dose? These MPCs are supposed to be sealed. Are you supposing that it has or will rupture because the worker has dragged their feet unblocking the vents? How does this make sense and to whom?

The writing of the CoC violates the clear writing rule and can cost the taxpayer money due to legal fees sorting it out.

The vents should be totally unblocked all of the time and certainly at 50% blockage they should be unblocked immediately.

It is past time to put a stop to Holtec's fraudulent mix and match of ASME (American Society of Mechanical Engineers) Codes. These ASME Codes have long existed to prevent boiler failures. The same principles as for boilers apply to spent fuel casks, except an explosion of these dry casks will poison the environment for longer than humans have been on earth.

On the one hand the Holtec CoC says that the Holtec MPCs will be "governed" by ASME- not even the latest version of it - but then they say "except" for sections V and IX . As ASME itself has been partially infiltrated by pro-nuclear lobbyists, I am unable to say if the newer code is better, than the 2007 one. But, a code should be followed through 100% or not at all. Not only does this Holtec CoC have a lengthy Table (3-1) of "approved" alternatives to the ASME Code, it even proposes alternatives to the approved alternatives, if there is "hardship" or "unusual difficulty". The Table 3-1 also engages in swaps of ASME code pieces and parts. They won't do what ASME requires but rather take from some other part of the ASME code. Holtec and NRC are either totally nuts or totally diabolical. I'm sure the same tricks are used for the concrete section. However, the MPC is the only thing which protects from deadly radiation escaping to the environment and it is only 1/2 inch thick.

I note that in 2000 Holtec requested, and received, an exemption to even having a CoC. They constantly ask for and receive amendments. This is either incompetence or fraud. Why wasn't it done right in the first place?

Both the NRC and Holtec are being investigated by high level authorities. Holtec is also being sued for fraudulent use of ASME codes, among other things. Maybe if you turn whistleblower now the authorities will go easier on you. Certainly God would go easier on you. If the authorities don't get you soon, God will get you in the end.