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**Comments to NRC Scoping meeting Aug. 5th 2015
San Luis Obispo, CA**

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Diablo Canyon Nuclear Power Plant Re-licensing

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Below is a web-site link to SLO Mothers for Peace suggestions what to include in the EIS for re-licensing the Diablo Canyon Nuclear Power Plant. Hereby, I make their suggestions my own and ask to put them into the record.

SLO Mothers for Peace web-site:

<http://mothersforpeace.org/blog/topics-to-address-at-august-5-2015-nrc-meeting-in-slo>.

I especially refer to:

I. LEAKS FROM DRY CASK CRACKING [see below]

. Additionally, in light of the many uncertainties in the seismic, once through cooling, component aging due to embrittlement, terrorism issues, I would urge you to put

II. Special emphasis on the “no-action” and “environmentally superior” alternatives.

III. Furthermore, I like to put into the record my own comments from Dec. 4th 2013 under Comment on the Waste Confidence Draft Generic Environmental Impact Statement and Proposed Rule

Docket ID # NRC-2012-0246.

LEAKS FROM DRY CASK CRACKING

The dry storage canisters at Diablo Canyon are just 5/8" thick stainless steel. In other countries, such as Germany, 14" to 20" thick ductile cast iron canisters/casks are used, such as the CASTOR V/19. The U.S. nuclear industry could have chosen the thick CASTOR sealed ductile cast iron casks. Instead, they use lower quality canisters, choosing profits over our safety. NRC documents provide data that indicate thin storage containers can fail 16 years after a crack initiates.

The NRC claims fuel must be reloaded into new canisters every 100 years, unless there is a permanent repository. However, they have no technical basis to state these canisters will last 100 years, but they do have data that indicates a much sooner potential failure rate.

None of the current U.S. thin steel storage canisters are adequately designed for over 20 year storage and may start failing in as little as 17 to 20 years with through-wall cracks. Vendor

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claims of longer storage times are not supported by data. There is no aging management designed into these thin canisters. They cannot even be inspected for cracks or repaired.

Numerous factors can trigger stress corrosion cracks in these thin canisters. Salt moist air is one that the NRC has studied more extensively than the others. The nuclear waste containers used in the U.S. were not designed to last for more than 20 to 40 years. And there is no current technology to inspect or repair these canisters for cracks and no current method to replace these canisters.

The nuclear industry has not been routinely inspecting installed dry storage canisters and has yet to develop a method to inspect them for cracks. However, a 2014 inspection found sea salt crystals on a Diablo Canyon canister that had only been loaded for two years. Only two Diablo canisters were inspected, ranging from just 2 to 3.5 years in service. The canister loaded for only two years had sea salts and a low enough temperature range to trigger the corrosive environment needed for stress corrosion cracking initiation — much sooner than the NRC expected.

Nuclear waste storage near the coast could fail and release radiation due to the corrosive nature of salt air with metal. Pitting corrosion in a salt fog environment is troubling. If a canister became sufficiently corroded, it would have to be replaced and the fuel assemblies moved. Further, the canister and fuel rods are pressurized, so the canister would leak radiation.

It is both illogical and immoral that the NRC would allow MORE highly radioactive spent fuel to be created every day when they know there is nowhere to store it safely, and there is a likelihood that the canisters will crack, exposing the environment to lethal radiation. You need to shut the plant down now.

Sincerely

Klaus Schumann