



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

10/21/2015

4FR 63843

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Template = ADM-013

E-RIS = ADM-03
All =
E. Wong (EHW3)



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Gallagher, Carol

From: rmorgal@wildblue.net
Sent: Friday, November 20, 2015 5:52 PM
To: Gallagher, Carol
Cc: Donna Gilmore
Subject: [External_Sender] Additional Comment to Docket ID NRC-2015-0241

Hello Carol,

It seems that only one comment is allowed via the online submission but I have one additional, very important, comment that I would like to include regarding the issue of retrievability of our nation's spent nuclear fuel.

Could you please include the comment below into the public comments on Docket ID NRC-2015-0241? If you would email me a reply regarding the receipt of the comment below it would be great.

Thank you,

Rick Morgal
13915 Mussey Grade Rd.
Ramona, CA 92065
760 788-4394

Since almost all our nation's spent nuclear fuel is being stored on-site at the nuclear facility where it was used, the method used to retrieve the spent nuclear fuel from a canister must be on-site.

Given the possibility that the spent fuel may not be transportable due to damage of the stainless steel canister, the ability to retrieve spent fuel from a canister must be deployable to all sites that currently store spent nuclear fuel in dry canisters or plan on storing the fuel on-site in dry canisters.

If on-site retrieval is not included in the planning process to get the fuel out of a canister, there will be no means to relocate fuel from a damaged canister off-site, regardless of the cause of the canister damage. These are 100 ton radioactive canisters, surely the NRC believes there needs to be a means of retrieving their contents, if the canister becomes damaged.

The process of developing a plan to retrieve the spent fuel from a dry canister should include a list of installed on-site infrastructure features at the ISFSI that will facilitate the retrieval of the spent fuel.

Features such as a cooling pool or hot swap tower, 150 ton gantry crane, air handling equipment, filtering equipment... All proven and developed, not left for a future generation to figure out and pay for.

If these requirements are placed upon decommissioning nuclear power plants that plan on implementing an ISFSI, it would be possible to reuse hundreds of millions of dollars of installed plant infrastructure to perform retrieval. Rather than having to rebuild the infrastructure later due to poor planning or wishful thinking.

It is incorrect to state "we don't know what will be needed to retrieve the fuel so we can't specify the infrastructure", that's leaving the problem to the next generation. This problem is our problem and we need to document how it is to be handled with current technology that is PROVEN.

The NRC needs to determine a method of retrieving the fuel from dry canisters and list the site infrastructure required to implement a PROVEN technique for ON-SITE retrieval of spent nuclear fuel from dry storage canisters.

With such a plan in place and list of infrastructure requirements to perform on-site retrieval, the public can then believe that the NRC is considering a most likely situation that might occur during the indeterminate period of time that the dry storage of spent nuclear fuel will reside on-site.

Anything less is a disservice to the public and our descendants.

Rick Morgal
Ramona, CA