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A Compendium of Spent Fuel Transportation Package Response Analyses to Severe Fire Accident Scenarios

Comment On: NRC-2015-0234-0001

A Compendium of Spent Fuel Transportation Package Response Analyses to Severe Fire Accident Scenarios; Draft NUREG/CR-7209; Request for Comment

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General Comment

Argument against massive and unnecessary radioactive waste transportation to Yucca Mt or another centralized interim storage site

If Yucca Mt were approved for storage of nuclear waste (i.e., highly radioactive "spent" nuclear fuel rods, the byproducts of nuclear power generation) currently stored on local sites where it was produced, 43 states and more than 100 cities of 100,000 or more would be impacted by the use of projected road, rail, and barge nuclear waste routes. According to projections, 9,495 containers would be shipped by rail, and 2,650 shipped by truck shipments, for a total of 12,145 containers traveling across our nation. At least 50 million people live within 3 miles of the projected transport routes.* (Data cited sourced from documentation produced by the NIRS (Nuclear Information and Resource Service [www.nirs.org]).

Yucca Mt could hold only part of the total waste stored. Also, moving this 64,000 MTU of waste to Yucca would likely take at least 20 years of continuous shipments. If only trucks were to be used, the number could be as high as 60,000 shipments.

Accidents are tied to shipment miles. The DOE risk assessment under this scenario projects 50 to 260 accidents and 250 to 590 incidents over the two decades of transport. This waste is thermally hot, and this is a

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challenge in packaging and moving the waste. Even perfect containers emit waves of radiation (gamma); it's as if the containers were Xray machines going down the road in the "on" position. Shielding sufficient to stop this radiation would make the containers too heavy to move. Also, casks used to ship spent nuclear fuel are NOT required to be physically tested: certification is provided by the NRC based only on computer simulations and scale model tests.

Radioactive Waste Management Associates of New York studied the rail tunnel fire in Baltimore in July 2001 and concluded that such conditions would breach a canister had the train carried "spent" fuel. Nuclear waste in that tunnel fire would have contaminated large areas of Baltimore, caused over 31,800 latent cancer fatalities over 50 years. Cleaning up costs were estimated to exceed \$13.7 billion.

The plans that Congress is working on would merely transfer accumulated nuclear waste to a different location (consolidated storage) with no improvement in the technology while adding and compounding the hazards of transport.

As a nation, we can ill afford the significant additional hazards of transport, in terms of the potential loss of lives, and contamination of cities as well as our agricultural heartland.

The solution to the problem of accumulating radioactive waste must be ending its generation as soon as possible.