

# PUBLIC SUBMISSION

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**Docket:** NRC-2015-0234

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

I find the NRC analysis of nuclear waste transport inadequate and misleading for the following reasons:

The only NRC approved high burnup transport cask is the NUHOMS MP197HB. NUREG/CR-7209 postulates that highly radioactive spent fuel rods will be transported using the HOLTEC HI STAR 100, which is not approved for high burnup fuel transport. Most of the irradiated spent fuel stored onsite at nuclear facilities can be classified as high burnup. High burnup fuel may need as long as 45 years in storage before it is deemed safe enough for transport.

The NRC has once again failed to address the core problem involving transportation of highly radioactive used fuel rods. In order to transport, the fuel rods will have to be transferred to a transport cask; however, the fragile, "thick canisters that are being used at most nuclear facilities may likely be leaking radiation at the time of transfer, making transfer itself a potentially lethal undertaking.

The potential for terrorism with regard to transportation of highly radioactive nuclear fuel is terrifying. With the rise in international terrorism and the targeting of nuclear power plants by ISIL, the oversized trucks and trains transporting nuclear fuel rods might as well have bull's eyes painted on them. These trucks and trains will be slow-moving, vulnerable, and lethal targets for terrorist groups who wish to do damage or to secure nuclear materials.

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Highly radioactive spent fuel rods should not be moved more than once. There is no permanent repository for the waste now; Congress has yet to even designate a proper, safe location for disposition of radioactive materials. To move the lethal waste not once, but TWICE, in order to continue to produce nuclear power, is unconscionable.