

# 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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Comment on FR Doc # 2016-01654

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## General Comment

The NRC has performed a careful analysis of real and theoretical rail accidents. The NRC has reached the correct conclusion that it is safe to transfer spent fuel by rail, in designed transfer casks.

I agree with this conclusion. Many hazardous materials are shipped by rail: but ONLY nuclear materials are shipped in such expensive and well-tested containers. Spent fuel shipping in designed casks is safe, and the casks have been tested, repeatedly, as fire and explosion safe. I personally wish that industrial chemicals would be equally as safely shipped! (There's a plywood factory about twenty miles from my house, and it is supplied by a rail line.)

I have toured French nuclear facilities, and was surprised to find that they do not let spent fuel cool in on-site fuel pools for more about two years. At that point, the fuel is taken out of the pools and shipped to a central facility, where it is held in a giant fuel pool. When the fuel is shipped, it is still physically hot. In this blog post about my visit to France, you can see the porcupine-like fuel shipment casks, with their porcupine bristles that dissipate heat. <http://yesvy.blogspot.com/2011/06/manufacturing-and-fuel-cycle-in-france.html#.Vvf4wTam73E>

American fuel is much cooler. American and French casks are designed to protect the fuel from fire and accident. American casks are not required to also cool fuel. However, the French system works safely, and has been safe for decades. So does the American system.

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<b>Add= J. Chang (JXC)</b>

The NRC has done an admirable job of ensuring all types of nuclear safety, including rail safety. I agree with this conclusion in the NUREG/CR-7209 document abstract:

"The combined summary of this work on fire accidents demonstrates that current U.S. Nuclear Regulatory Commission regulations and packaging standards provide a high degree of protection to the public health and safety against releases of radioactive material in real-world transportation accidents, were such events to involve SNF containers."

Approve the current standards, and do not waste taxpayers money on endless and useless "improvements." If it ain't broke, you can test it (as you have). But if it ain't broke, and it passes the tests...don't "fix" it.