

PUBLIC SUBMISSION

As of: 3/31/16 10:34 AM
Received: March 28, 2016
Status: Pending Post
Tracking No. 1k0-8oqv-vuh5
Comments Due: March 28, 2016
Submission Type: Web

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

Document: NRC-2015-0234-DRAFT-0025

Comment on FR Doc # 2016-01654

*1/27/2016
81 FR 4680*

(JH)

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2016 MAR 31 AM 10:41

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General Comment

March 27, 2016

Attn: Cindy Bladey, Chief, Rules, Announcements, and Directives Branch (RADB), Division of Administrative Services, Office of Administration

Carol Gallagher
US Nuclear Regulator Commission

RE: Docket ID NRC-2015-0234 NUREG/CR-7209

COMMENTS ON: A Compendium of Spent Fuel Transportation Package Response Analyses to Severe Fire Accident Scenarios, DRAFT

First of all, this report is very disturbing...not because of what it says, but for what it doesn't say. It reminds me of a conversation I had with the NRC representatives when I was a San Luis Obispo County Supervisor and the new dry cast storage facility was being proposed for the Diablo Canyon Nuclear Power Plant (which was in my district).

When we were discussing the proposed containers, I asked if they were the "safest" ones? The NRC representatives replied: "To design that would be cost prohibitive." I then asked if the proposed containers were the safest ones "available"; meaning the safest ones "on the market"? To which they carefully said that

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Cdd = J. Chaney (fxct)*

the containers met NRC standards.
In other words, no.

We are hearing unprecedented public anger in this election year. Invariably, it comes down to the profound distrust people have of large corporations and big government. The Nuclear Regulatory Commission is "government" in action. The NRC is supposed to be there to protect citizens from the potential safety compromises that profit-driven corporations may engage in. And what is unique about the responsibilities of this particular agency is that the ramifications aren't for incidents like a BP oil spill, or even an Exxon Valdez. Potential nuclear accidents are a matter of life and death...the real lives of real people. Besides the possibility for direct personal contamination, nuclear accidents can render huge swaths of our precious land uninhabitable.

Words like "good" - as in the draft's sentence "using typical good practice standards" - leads one to wonder why can't we reflect the "best" in our standards? Why is it ok to meet only "good" standards? There's even more word-smithing, for instance..."this code is widely used in the industry" and "occurs with extremely low frequency."

Fukushima's reports said all that too.

"Spent nuclear fuel"...a term reminiscent of an oil change, is another euphemism meant to keep the public from being too concerned about the dangers of the high level radioactive waste that is actually being transported or stored near them.

The most egregious example of avoiding relevant data and the NRC's deliberate manipulation is the report's selection of rail accident years. 1997-2008. This is 2016!

The selection of these particular years avoids having to account for, or take into consideration, the many rail accidents that have happened since oil became such a huge rail transport business. This document is supposed to be a current report and yet the latest data is from 2008? Heck, even the survey for NRC website users is dated 2016!

And you wonder why people mistrust government?

There's information about "burn rates" and "fire spread charts" but nothing about the condition of the rails and the aged facilities expected to carry the weight loads of this high level radioactive waste. According to industry sources, the average age of all U.S. freight rail cars was between 20 to 24.5 years. Ironically, this NRC report comments that: "As the train was passing through the tunnel, 11 of the 60 rail cars derailed." The age of the tracks, the fact that many locations have only single tracks, and the cars themselves should be a source of great concern in the safety analysis.

I think the public wants to see analyses reflecting "this is the best practice" for safety on our rails. Where nuclear safety is concerned "good enough", "not cost effective", or just "meets our standards" are not reassuring words. While I can appreciate the fact that the NRC is finally examining the safety of rail transport, it is imperative that it be done with eyes wide open, drop the word-smithing and include all the current data. This high level radioactive waste is going through our densely populated cities and family neighborhoods...often within feet of our homes and businesses. Because of the severity of the consequences of any accident, the NRC has the responsibility and moral obligation to all Americans for being thorough in its analysis and for providing for BEST safety practices!

"Trust" is something that needs to be earned.

Respectfully submitted,

Peg Pinard
Former Mayor, City of San Luis Obispo and
Chairman of the San Luis Obispo County Board of Supervisors