

<b>As of:</b> 4/14/16 10:32 AM
<b>Received:</b> April 13, 2016
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 1k0-8p23-6c53
<b>Comments Due:</b> April 13, 2016
<b>Submission Type:</b> Web

# PUBLIC SUBMISSION

**Docket:** NRC-2015-0270

List of Approved Spent Fuel Storage Casks - Holtec International HI-STORM 100 Cask System, Amendment No. 10

**Comment On:** NRC-2015-0270-0002

List of Approved Spent Fuel Storage Casks: Holtec International HI-STORM 100 Cask System; Certificate of Compliance No. 1014, Amendment No. 10

**Document:** NRC-2015-0270-DRAFT-0010

Comment on FR Doc # 2016-05709

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## General Comment

NRC Docket 0215-0270 Public Comments on Proposed Rule: List of Approved Spent Fuel Storage Casks: Holtec International HI-STORM 100 Cask System; Certificate of Compliance No. 1014, Amendment No. 10.

First, a general observation as a non-engineer stakeholder, is this Proposed Rule was prompted by noting this is HOLTEC's 10th Amendment, on Certificate of Compliance No. 1014. Many find this pattern disturbing, because the nine (9) earlier serial revisions and Amendments on this HOLTEC International HI-STORM 100 Cask System (and other HOLTEC products) suggests that HOLTEC's overall performance to achieve technical accuracy has been poor, not only on HOLTEC's first original submittal of technical specifications and Quality Assurance (QA) for this product, but apparently during the series of nine (9) subsequent Amendments.processed earlier, and approved by NRC on this HOLTEC product.

Because this is HOLTEC's 10th Amendment, an argument is reasonable that HOLTEC also fails to fully address the entire range of technical deficiencies in a comprehensive manner, and instead appears to have only applied full QA level expertise in incremental steps. Based on the overall absence of actual evidence derived from extensive operational experience or testing that stakeholders in southern California have observed so far, it hasn't been unusual when 'expected' service life projections, or when computer modeled predictions are applied to estimate system behavior, or estimate performance capabilities, (such as San Onofre

Steam Generator Replacements), there have been drastically different outcomes, extreme failures and major departures between predictions and actual performance, resulting in radiation release in Unit 2, during January 2012, which eventually led to premature reactor retirement at SONGS.

Since this Proposed Rule pertains to same, or similar type of HOLTEC Spent Fuel Storage Casks expected to be installed partially underground at a new ISFSI on exposed coastline at San Onofre (SONGS), stakeholders in southern California have been extremely disappointed that this 5/8" thin metal cask fabricated by HOLTEC was chosen by Licensee (Southern California Edison), as opposed to thicker (14"-20") casks that can be inspected (real time), fuel condition can be monitored, or stress corrosion crack depth measured.

Despite extensive public controversy, extreme disagreement among technical experts between nuclear industry, consultants, contractors and other highly qualified experts outside the industry, NRC has mostly 'dismissed' multiple credible public safety concerns. Many stakeholders have been disappointed, and note that Edison's "Community Engagement Panel" CEP has so far failed to fully function as an independent advisory Panel of experts, and instead functions more as a promotional extension for Southern California Edison (SCE)'s marketing and media platforms. Many think NRC has allowed utility to improperly apply credit for performing an 'educational' function, when no expense has been spared by Licensee on plant tours, educational events, displays, and extensive media material and scripted press releases, developing public support through extensive private meetings with elected officials in adjacent communities in San Diego and Orange County. Many still assert Licensee consistently underestimates actual extent of potential public safety risks associated with Decommissioning Plan, has severely overestimated performance capabilities of equipment, components and parts, defense in depth, operator training, emergency response capability, system reliability, cost containment, and technical capability to safely implement Aging Management Programs.

A large inventory of spent nuclear fuel at San Onofre consists of more recent class of 'high burn-up' fuels commonly used by industry in fuel assemblies. It is reasonable that stakeholders have extreme safety concerns about accuracy of the 'predicted service life' of the HOLTEC Umax casks, thermal tolerance variability, measurement of air velocity, modeling of heat load distribution, performance capability and integrity of fuel cladding. With proposed increases in alloy material, concerns on accuracy of predicted helium pressure limits for MPC in underground installations w/closed loop forced helium dehydration (FHD) as mandatory for drying MPCs with one or more high burnup fuel assemblies or a higher heat load. Despite unproven vendor assurances on performance capabilities of HOLTEC casks, stakeholders note a 2015 Sandia Lab report contained evidence that similar thin metal casks had through wall cracks in only 5 years.

Stakeholders in California demand, and deserve nothing less than Best Available Control technology, and cask design, and stakeholders present evidence to prove why HOLTEC series of spent fuel casks is an inferior choice. Evidence and references are contained in website prepared by Donna Gilmore: [sanonofresafety.org](http://sanonofresafety.org).