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# 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-0009

Comment on FR Doc # 2016-05709

## Submitter Information

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## General Comment

Comment on "ID: 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"

Holtec running the NRC is made clear in the collusion found in ML15327A043. This is wrong and probably illegal. "From: Kimberly Manzione [mailto:K.Manzione@Holtec.com] Sent: Friday, November 20, 2015 4:31 PM To: Goshen, John Subject: [External\_Sender] RE: Final Condition 9 languageJohn, Holtec concurs with the below condition. Thanks, KimFrom: Goshen, John [mailto:John.Goshen@nrc.gov] Sent: Tuesday, November 17, 2015 3:21 PM To: Kimberly Manzione Subject: Final Condition 9 languageKim, I believe this has the changes you recommended. I will need Holtec's concurrence on this. Thanks, John" ML15327A043

The NRC budget is part of the US budget. The percentage recovered should be in fines and not fees.

According to ML14352A384 the standard currently used for the Holtec SNF Casks is 1.20 to 1.30% Manganese alloy. The new "standard" allows 1.50 or 1.60% Manganese. At 1.5% Manganese the steel becomes brittle and continues to do so until 4-5% manganese. Furthermore, these standards are not specific to the nuclear industry. Nor can they compensate for poor design. The alloy formula must be tested and specific for this particular design and nuclear spent fuel use. You cannot grandfather in for environmental testing, as you have done. A new metal must be re-tested, whether or not you tested the original.

The cozy letter implies fraudulent intent, as does the content. Measurements are NOT supposed to validate methods outside of experiments testing theory. This implies intent to play with numbers to get what you

and/or Holtec want, as does the word demonstrate. "For the storage configuration, each user of a HI-STORM 100 Cask... shall perform a thermal validation test in which the user measures the total air mass flow rate through the cask system using direct measurements of air velocity in the INLET VENTS. The user shall then perform an analysis of the cask system with the taken measurements TO DEMONSTRATE THAT THE MEASUREMENTS VALIDATE THE ANALYTIC METHODS described in Chapter 4 of the FSAR... in lieu of additional submittals pursuant to 10 CFR 72.4, users may document in their 72.212 report a previously performed test and analysis submitted by letter report to the NRC that demonstrates validation of the analytic methods described in Chapter 4 of the FSAR". ML15327A043

All flow and temperature should be measured on intake and output and within the annulus and with an up to date measurement device and not an antiquated anemometer. The measurements need to be constantly done and not one time only.

Holtec's claim they can't measure airflow and the ductwork proposal is the most stupid and bizarre thing yet proposed. ML15226A560 Maybe Holtec should hire an American with common sense instead of a German.

Proper temperature measurement matters: "The allowable long-term temperature limit for the overpack concrete is less than the limit in NUREG-1536, which limits the local concrete temperature to 300°F, ... NUREG-1536; however, a conservative long-term temperature limit of 200°F is applied to the concrete. For short term conditions the concrete temperature limit of 350°F is specified in accordance with Appendix A of ACI 349. The allowable temperatures for the structural steel components are based on the maximum temperature for which material properties and allowable stresses are provided in Section II of the ASME Code." (ML072420254 p. 295) While this is poorly written and unclear, it does make clear that temperature matters. Thus proper measuring of temperature matters and it should be properly measured on a continuous basis. Each cask should be tested due to a) possible defects in casks or loading, b) differences in fuel types and ages. Monitoring should be constant due to c) changes over time.

Adequate info is not provided on the other topics, but knowing Holtec-NRC record must be presumed to further diminish safety of this flimsy system. Thus, I object.

NRC has not made the topics clear, nor attached the relevant documents in an orderly, clear manner, thus violating: "The Plain Writing Act of 2010 (Pub. L. 111-274) requires Federal agencies to write documents in a clear, concise, well-organized manner that also follows other best practices appropriate to the subject or field and the intended audience".

Holtec casks violate US law as the only protection from lethal radiation leaks is the 1/2 inch MPC, whereas "The spent fuel storage cask must be designed to provide redundant sealing of confinement systems." and "The spent fuel storage cask must be designed to provide adequate heat removal capacity without active cooling systems." <https://www.law.cornell.edu/cfr/text/10/72.236#a> The refusal to properly test the second point appears intentional to avoid knowing if it properly removes heat.