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Waste Control Specialists LLC's Consolidated Interim Spent Fuel Storage Facility Project

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RULES & PROCEDURES

General Comment

DOE warned in its Feb. 2002 Final EIS on the proposed Yucca Mountain, Nevada national burial dump, that loss of institutional control would eventually prove catastrophic. If institutional control is eventually lost at WCS's high-level radioactive waste parking lot dump, the containers will eventually fail, and catastrophically release their hazardous, high-level radioactive waste contents into the living environment. Hazardous and even deadly fallout would then flow with the winds and the waters, downwind and downstream, over greater and greater distances over time. High-level radioactive waste remains hazardous, even deadly, for millions of years into the future.

Such impacts could extend to the immediately adjacent and perhaps even underlying Ogallala Aquifer. Also, downwind or downstream surface level fallout from WCS could eventually find its way into the Ogallala, through natural flow paths. The Ogallala provides essential drinking and irrigation water for millions in Texas, New Mexico, Oklahoma, Kansas, Colorado, Nebraska, Wyoming, and South Dakota. As the water protectors at the Standing Rock Sioux Tribe reservation say on the Missouri River in North Dakota, Mni Wiconi, Water Is Life. This was made very clear by recent drinking water contamination disasters in Flint, Michigan; Charleston, West Virginia; the Animas River in Colorado, New Mexico and Utah; and Toledo, Ohio. A radioactive release into or contamination of the Ogallala would be catastrophic.

Making these risks all the worse, NRC has allowed a quality assurance (QA) failure crisis to persist in the

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U.S. nuclear power industry for years and decades. These QA failures extend not only to on-site storage casks, but also to the shipping cask and away-from-reactor storage cask realm.

Industry and even NRC whistle-blowers called attention to these QA failure risks 17 long years ago, yet little to nothing has been done to correct them. Industry whistle-blower Oscar Shirani questioned the structural integrity of NRC-approved and industry-utilized storage casks sitting still, let alone traveling 60 miles per hour or faster on the railways. Shirani was backed up in his allegations by NRC Midwest Region dry cask storage inspector, Dr. Ross Landsman, who warned "The NRC should stop the production of the casks...."

Such QA failures, shoddy design, and shoddy fabrication, of the storage casks, means that their eventual failure, and release of their deadly hazardous high-level radioactive waste contents, will only happen all the sooner.

Shirani and Landsman's revelations were about Holtec casks, NRC's incompetence at best, or even collusion with industry, when it comes to cask QA violations, extends to other cask models and designs, including NAC and Areva casks to be used at WCS, TX.

Nuclear Assurance Corporation (NAC) container - to be used at WCS -- QA failures are of specific concern. Last autumn, shoddy welding by NAC led to the bottom literally falling out of an irradiated nuclear fuel assembly transfer caddy, allowing the assembly to strike the bottom of the storage pool at Chalk River Nuclear Labs in Ontario, Canada. Such bad welding calls into question the welds on NAC storage and transport containers as well.

At Davis-Besse atomic reactor on the Great Lakes shoreline near Toledo, Ohio, an Areva design Transnuclear NUHOMS storage cask was loaded with irradiated nuclear fuel, despite local environmental interventions to stop it, after it was revealed the walls of inner canister holding the high-level radioactive waste were ground too thin. But violations of technical specifications for the design and manufacture of casks in the U.S. are as rampant as QA violations.

All this boils down to the risk that de facto permanent abandoned of high-level radioactive waste at the surface, at WCS, could lead sooner rather than later to cask failure, and catastrophic radioactivity release.

NRC, in its Nuclear Waste Confidence Draft Environmental Impact Statement, asserted that whether on-site or away-from-reactor (as at WCS), failing dry casks could simply transfer their contents into a brand new replacement cask. But not a single such transfer has ever taken place in the U.S., dating back to the advent of dry cask storage (at the Surry atomic reactor in Virginia) in the mid-1980s. This, despite the fact that numerous dry casks, as at Palisades in MI, are acknowledged by industry and/or NRC to be defective.

NRC asserted in its DEIS that non-existent "Dry Transfer Systems" could be built at some unspecified future date, with no known source of funding, to accomplish this cask-to-cask transfer, when needed.

Abandonment and eventual failure of high-level radioactive waste storage containers at WCS could well lead to the catastrophic releases of hazardous radioactivity that DOE warned about in its Yucca Mountain Final EIS in Feb. 2002