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Docket: NRC-2017-0211
Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities

Comment On: NRC-2017-0211-0001
Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities; Request for Comment on Draft NUREG

Document: NRC-2017-0211-DRAFT-0013
Comment on FR Doc # 2017-24734

Submitter Information

(12)
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General Comment

See attached file(s)

I oppose the current plan to store spent fuel at San Onofre. Please see attachment it was written by another party but expresses my concerns.

Attachments

2019-01-02

SUNSI Review Complete
Template = ADM – 013
E-RIDS= ADM-03
Add= Jeremy Smith (J955)

Date: January 2, 2018

Comments to NRC Docket ID NRC-2017-0211, NUREG-2215
NRC Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities Draft, November 2017
https://www.nrc.gov/docs/ML1731/ML17310A693.pdf

The NRC cannot meet its mission to "ensure adequate protection of public health and safety and the environment" if it continues to allow thin-wall welded canisters they admit are vulnerable to cracks, that cannot be fully inspected (inside or out), and cannot be repaired, maintained and monitored to prevent (not just detect) radiological leaks. There is no adequate or proven detailed plan required to address major radiological leaks, or to address on-site replacement of containers. Seismic requirements for partial cracks is not addressed. See below webpage for details on the Holtec UMAX System planned for San Onofre and why this is an example of a system with major problems that should not be approved.
https://sanonofresafety.org/holtec-hi-storm-umax-nuclear-waste-dry-storage-system/

Each canister contains about as much or more lethal Cesium-137 as released from the 1986 Chernobyl nuclear disaster, yet the NRC knows the boron metal in the canisters will not prevent the fuel from going critical if exposed to non-borated water from through wall cracks (in storage or transport).

NUREG-2215 states it requires "conservative assumptions", "inspections", and admits to many "unknowns". NUREG-2215 is not "conservative", does not require adequate "inspections", and does not resolve the many "unknowns" that would be eliminated if the NRC mandated and enforced critical safety requirements to inspect, monitor, maintain and repair (both inside and out) to PREVENT leaks.

Proven dry storage technology exists that meets critical basic safety requirements we expect in a car. Does the NRC consider thin-wall canisters "conservative assumptions" compared to thick-wall casks? If so, why? Why does the NRC allow containers that do not meet these basic critical safety requirements?

Respectfully,

Donna Gilmore, SanOnofreSafety.org
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Basic Safety Requirements	**Thin-wall canisters**	**Thick-wall casks**
Thick walls	No. Only 1/2 to 5/8th of an inch	Yes. 10 to 19.75 inches
Won't crack.	No	Yes
Ability to inspect inside & out, maintain, repair (fuel baskets, other parts)	No	Yes
Monitor to fix problems ***before*** leaks	No	Yes
ASME ***container*** certification	No	Yes
Defense in depth (redundancy)	No	Yes
Stored in concrete building	No	Yes
Gamma & neutron protection	Requires vented concrete overpack	Yes
Transportable	No transport with cracks. 10 CFR § 71.85	Yes
Proven technology	No. Conditions unknown. Most in use less than 15 yrs, a few 30 yrs.	Yes. Inspected and used over 40 years