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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

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Comment on FR Doc # 2017-24734

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General Comment

Docket ID NRC-2017-0211

I do not understand why the NRC would support the use of thin-walled canisters. Such canisters clearly do not have the safety features needed to protect us or the environment. They are an accident waiting to happen, and once they begin to leak, it will be next to impossible to contain the damage. The short-term savings will only lead to escalating long-term costs.

I strongly endorse the following comment submitted by Donna Gilmore.

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 assumpt ions", "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 a nd 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,

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