PUBLIC SUBMISSION

As of: 1/9/18 1:11 PM
Received: January 02, 2018
Status: Pending_Post
Tracking No. 1k2-90pg-oufi
Comments Due: January 02, 2018
Submission Type: Web

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-0119
Comment on FR Doc # 2017-24734

Submitter Information

(118)
82 FR 52944
11/15/2017

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General Comment

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

SUNSI Review Complete
Template = ADM – 013
E-RIDS= ADM-03
Add= Jeremy Smith (JAS5)

TO WHOM IT MAY CONCERN: I have no confidence in the NRC's Nuclear Waste Plans for San Onofre's SFDS. I have grave concerns that the NRC is considering to allow the burial of 3.6 million pounds of hot nuclear waste that will remain permanently deadly to all life for more than 10,000 generations; and to bury it only 108 feet from the beach on the shoreline of the Pacific Ocean? This is clearly a huge burden that the NRC has undertaken to relinquish

onto the public this TOXIC NUCLEAR TRASH (TNT) and putting 8 million people in extreme danger in one of the most densely populated regions in the U.S. ... and on an earthquake fault? ... in a tsunami zone? ... and on a bluff that is likely to collapse? It is my strong advice as an environmental health and safety advocate that you reconsider all of your options and most of all the comments proposed to you at this time. Here are mine.

SUMMARY: The solution to the radioactive waste problem begins with shutting down the nuclear power plants that generate it in the first place. As far as the highly radioactive waste that exists and continues to be produced, putting it on trucks, train cars, and barges and transporting it across the country to a scientifically-indefensible site solely for the benefit of the nuclear power industry is an unacceptable environmental health and safety risk to our cities, our communities, our agricultural heartland, and our entire nation. Not only are there numerous safety and emergency issues to consider, there are also design deficiencies in the U.S. storage casks and shipping containers themselves. The NRC, utility owners, local, state and federal regulators must do everything they can to ensure nuclear waste storage and transportation decisions are based primarily on safety concerns above all else, and not on profits.

1. I strongly endorse the well informed responses and suggested actions recommended by SanOnofreSafety.org (http://files.constantcontact.com/ffe06ec5201/1afa48b2-d770-4703-b178-81e14dafe9f1.pdf) particularly with regards to the construction of the containers and casks themselves ... You must ensure the strongest thickest walled casks that can be manufactured to meet NRC's mission to "ensure adequate protection of public health and safety and the environment," and those casks and containers and SFDS must be designed to endure the marine environment for the longest period of time possible as there is no option for a longterm repository on the horizon ... and to enable the accessibility, retrievabilty, and detectability for monitoring of any casks that crack and need to be removed; and thus this storage system must allow for proper inspection or detection should a fuel pool or hot cell need to be removed from a cracked canister.

2. I also strongly recommend that you endorse and consider the Helms Proposal http://www.copswiki.org/Common/HelmsProposal which specifically warrants the dual-wall design canisters and 1,000 year life span ... which are safer and more resilient and will last longer than the 40 years design that the NRC is considering for storing nuclear waste ... especially away from the water, with proper ventilation ... with a 24/7 electronic monitoring capability ... i.e. accessibility and retrievability and thus a storage system that allows for proper inspection for detection should a fuel pool or hot cell need to be removed from a cracked canister. Licensing term of only 40 years is far too short for public confidence that these systems will last the time they will be required with no geologic repository on the horizon. Single-wall canisters are too thin and flimsy for this purpose!

Please remember that the storage of this highly toxic nuclear waste the NRC is planning is

only 108 feet from the water's edge; only a few inches above the water table with a main freeway and railroad directly above it in a highly dense population of 8 million people. NRC's risk assessment should not be based on the best scenario ... but the absolute worst. That is how the NRC will be able to perform the duty of its mission set forth to do on behalf of the health and safety of the public and the environment.

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