

# PUBLIC SUBMISSION

<b>As of:</b> 3/27/18 8:49 AM
<b>Received:</b> March 24, 2018
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 1k2-926w-zgxxk
<b>Comments Due:</b> June 05, 2018
<b>Submission Type:</b> Web

**Docket:** NRC-2018-0017  
Storing Spent Nuclear Fuel Waste

**Comment On:** NRC-2018-0017-0003  
Requirements for the Indefinite Storage of Spent Nuclear Fuel

**Document:** NRC-2018-0017-DRAFT-0003  
Comment on FR Doc # 2018-05776

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose the proposed legislation of indefinite storage of spent nuclear fuel (SNF) by the Nuclear Regulatory Commission (NRC). I believe that there are no substantive safety or security reasons that would necessitate permanent storage of SNF. Additionally, there are no compelling cost savings to the Federal government associated with adoption of indefinite storage of spent nuclear fuel. Finally, there is sufficient space at all operating nuclear reactors to store all spent nuclear fuel in pools and in existing or additional dry casks that will be discharged even with plant license extensions.

The Nuclear Regulatory Commission which is the federal agency in charge of the safety of spent nuclear fuel has concluded that spent fuel storage in pools and casks is safe and secure. Further, the commission asserts that for over three decades spent nuclear fuel has been stored in repository and barrel in the United States without any significant release of radioactive material to the environment or leakage of the surmountable quantity that could cause harm to the general public.

It is imperative to note that despite the substantial safety record, no storage method can provide absolute protection. There are scenarios in which a terrorist attack on a storage site

could result in the release of radioactive material, but this cannot be associated with storage of the spent nuclear fuels at the reactor sites.

I believe that the interim dry-cask storage facilities can be maintained with a high level of confidence for at least 50 years and likely much longer. Additionally, periodical replacement of the casks could even elongate further their lifetimes. Consequently, there are no technical barriers to the safe and secure interim storage of spent fuel as long as adequate resources and attention are devoted to maintaining the storage facilities. Furthermore, SNF transportation in the United States of America has proven to be safe for long periods of time. Therefore, concerns of explosions or leakage of the spent nuclear fuel while in transit should not be used as justifications to advocate for permanent storage of SNF by the federal government. World over, more than 100,000 tons of spent fuel has been transported by rail, road and ship and there have been no reported large-scale releases of radioactive materials from spent fuel casks in transport in the United States or any other western country. I would recommend that for efficiency and effectiveness, the Federal government can adopt interim storage of the SNF and apply strong security measures to mitigate unwarranted access to its nuclear fuel sites.