

APR 17 2018

As of: 4/6/18 7:26 AM
Received: April 05, 2018
Status: Pending Post
Tracking No. 1k2-92fe-szf8
Comments Due: May 29, 2018
Submission Type: Web

# PUBLIC SUBMISSION

**Docket:** NRC-2018-0052

Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Comment On:** NRC-2018-0052-0001

Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Document:** NRC-2018-0052-DRAFT-0006

Comment on FR Doc # 2018-06398

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## Submitter Information

83 FR 13802

⑥ 4/6/2018

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## General Comment

The environmental risks posed by irradiated fuel are extreme: As observed by the U.S. Court of Appeals, it has "the capacity to outlast human civilization as we know it and the potential to devastate public health and the environment." Nuclear Energy Inst., Inc. v. Env'tl. Prot. Agency, 373 F.3d 1251 (D.C. Cir. 2004). If irradiated fuel is dispersed into the environment, its radionuclides are sufficiently toxic to cause irreparable contamination of large areas of land and entire river and lake systems and coastal ecosystems.

The risk of nuclear weapons proliferation posed by irradiated fuel is also significant. Each metric ton of spent fuel typically contains more than one Nagasaki-bomb equivalent of plutonium and, as of 2016, well over 70,000 metric tons had already been created in the United States by the commercial nuclear power reactors. Spent fuel, storage and/or disposal may pose a risk of theft if it is stored or disposed of in a manner that would allow access in a few hundred years, when the fission product radiation barrier would have declined to low levels.

I propose a set of principles for the safe management of commercial irradiated nuclear reactor fuel (i.e., commercial spent fuel) and high-level radioactive waste. The principles are designed to address the significant public health, environmental, and security risks posed by irradiated fuel. They recognize that irradiated fuel poses hazards for periods of time far longer than human history and must be managed in a way that minimizes its environmental, health, and security risks to the extent possible. And they recognize that nuclear power and nuclear weapons are intimately connected, not least in the issue of nuclear spent fuel and its management.

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Template = ADM - 013

E-RIDS= ADM-03

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ML 18099 A047