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Storing Spent Nuclear Fuel Waste

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

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Submitter Information

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General Comment

I am in agreement with the petitioner Raymond Lutz and Citizens Oversight, Inc. I believe that the petition made towards the NRC is justified in that the NRC should have a better thought out solution for handling spent nuclear waste. The revision regarding spent nuclear fuel stored in independent spent fuel storage installations at nuclear power stations seems completely justified to a concerned citizen as the petitioner seems to have the interests of the general public closer in mind. The petitioner asserts that surface storage of spent nuclear fuel will continue indefinitely and so the NRC should address issues concerning the indefinite surface storage of spent nuclear fuel in the dry cask storage systems, as from the comments of the petitioner the NRC currently stores the spent nuclear fuel in independent spent fuel storage installations which have a license for 40 years but that begs the question of concern of what will the NRC do once the 40 years are up? Will the NRC consider the storage as safe even though that is not truly the case? There is no geologic repository and so the petitioner wants the NRC to have regulations that will embrace a longer design life and must define what design life means and that there must be a guarantee of continued storage with working containers. It will cost money to repackage the waste so it is much smarter to think of a costly but more permanent solution than picking the easy solution. The NRC should deal with the problem now as the current independent spent fuel storage installations only last 40 years. The

petitioner is requiring that the NRC explicitly state a 1,000 year design life goal for spent nuclear storage systems and that the NRC adapt the HELMS approach. The HELMS approach requires monitoring and replacing parts of the system at regular intervals to make sure that the storage can work as efficiently as possible which I am in agreement with. HELMS would embrace surface storage and store spent nuclear waste in a safe, passive and indefinite manner on the surface and not wait for a solution to come up in the future. It is a solution that can bring answers today, and not leave the burden of nuclear waste to the future generation. HELMS also deals with eminent terrorist attacks as well as unpredictable events, the waste would be moved to about a half dozen interim storage sites away from coastal areas or waterways to prevent contamination. The petitioner's approach realizes that the NRC's response of placing the waste in geologic repositories is not reasonable as these geologic repositories do not exist, the waste would be too hot to place in geologic repositories if they were available, and that the geologic repositories would have to be ventilated for at least 200 years which would also be expensive in the long run. The petitioner's request is justified in having the design life be 1,000 years because the spent nuclear fuel is toxic for at a minimum 150,000 years and this could affect the public as well as those that work with nuclear materials on the daily basis. This material if not taken care of appropriately could cause long lasting damages to the human population such as radiation and death. However, I am a little worried about the surface storage protocol that was mentioned by the petitioner. I would like more clarification on where the surface storage locations would be localized, how they would be implemented on the surface, and how it could possibly affect the environment as well as human populations. I would like the petitioner to elaborate a little more on this part of the HELMS approach, as I think the rest of the requests are justified. It is a concern of a citizen that I believe many other citizens worry about too, what is the impact of nuclear fuels on the surface to the human population? I would like the NRC to take the petitioner's requests seriously to help create a better tomorrow for our nation.