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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

June 4, 2018

Comments to NRC Docket NRC-2018-0017I
Requirements for the Indefinite Storage of Spent Nuclear Fuel
Office of Nuclear Material Safety and Safeguards (NMSS)
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I strongly urge the NRC to consider the petitioner's (Raymond Lutz) recommendation to amend its regulations in 10 CFR part 72 regarding spent nuclear fuel and use a Hardened, Extended-life, Local, Monitored Surface Storage (HELMS) approach which is described in the petitioner's white paper submitted with the petition (ADAMS Accession No. ML18022B213). The HELMS approach requires that nuclear spent fuel containers be designed for 1,000 years rather than the current process of NRC licensing for 40 years with possible renewal of another 40; and to employ the Helms Proposal 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 allowing for proper inspection for detection should a fuel pool or hot cell need to be removed from a cracked canister. NRC's 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 far too thin and flimsy for this purpose!

Also, please remember for instance, in the case of San Onofre Nuclear Generating Station, that the storage of this highly toxic nuclear waste being planned is only a little more than 100 feet from the water's (Pacific Ocean) 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. The NRC's risk assessment in all cases of "Indefinite Storage of Spent Nuclear Fuel" should not be based on the best scenario or the least expensive ... but should always be determined on the absolute worst with people's safety first and costs last. That is how the NRC will be able to perform the duty of its mission to protect the health and safety of the public and the environment.

Thank you,
Laura Lynch
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