

# PUBLIC SUBMISSION

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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

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From everything Ive learned about the current situation with storage of nuclear waste from decommissioned nuclear power plants, I feel its important that you update your requirements for safe storage to address the fact that we dont have the repository we thought wed have available in 1998.

As a result, we now have temporary storage practices that dont meet the kind of longer-term storage methods needed. The waste currently stored at the San Onofre beach site is unsafe even for short-term storage because of the geology and nearby ocean water, and the inadequate canisters described in others comments.

I request that you give serious consideration to the petition submitted by Ray Lutz and Citizens Oversight Inc. I believe its critical that you apply extended life criterion to storage of spent nuclear fuel, and the HELMS proposal serves as a well thought out guide.

While there are many locations across the country that lack safe storage sites for the waste from decommissioned nuclear power stations, I can speak most directly to the situation we

have here in my neighborhood, within the danger zone surrounding the San Onofre Nuclear Generating Station (SONGS). Although I'm not a scientist myself, I have immersed myself in research and attended several local workshops addressing this issue.

The operators of SONGS, Southern California Edison (SCE) used bad judgment in the past when the power plant was still in operation. They changed the design of the cooling rods without sufficient oversight, resulting in a release of radiation and subsequent forced shutdown and closure of the generating station.

I believe we are now experiencing danger because of similar poor judgment and oversight regarding temporary storage of the spent nuclear fuel at this site. As an example, earlier this year, they changed the design of a bracket that fits inside the steel storage canister. The bracket provides support while allowing necessary air circulation through the canister.

While preparing to place one of the newly designed brackets, the workers found a broken peg from the bracket. Realizing the bracket was unsafe, they stopped using the newly designed brackets and resumed use of the older style support.

However, and importantly, they had already placed several of the new brackets into canisters, which were permanently sealed before the workers discovered the design flaw in the bracket.

I learned while attending the SCE community engagement panel meeting in March 2018, that they have no way to determine whether there are weak or broken pegs inside the already sealed canisters using the questionable bracket design. They have no way to open the canisters to check the brackets and said it would take several years for engineers to come up with an answer about how to safely unseal these canisters and indicated that it just didn't seem to be in the realm of possibility.

All interested parties, including SCE, want to remove the canisters from the current vulnerable location to a more suitable place for long-term storage. An essential step in the process is getting an updated NRC regulation so that an appropriate location and optimum equipment can be approved for licensing.

I'm concerned for residents' safety wherever such waste is stored, and for that reason, hope that you work to update regulations and provide guidance and new regulations for safely storing spent nuclear fuel for up to 1000 years in the same location, to avoid having to move it more than once.

Whatever the location, the HELMS proposal paves the way so that operators can take the necessary action. Please help in this effort.