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Docket: NRC-2018-0066

NUREG-2224, Dry Storage and Transportation of High Burnup Spent Nuclear Fuel, Draft Report for Comment.

Comment On: NRC-2018-0066-0001

Dry Storage and Transportation of High Burnup Spent Nuclear Fuel

Document: NRC-2018-0066-DRAFT-0011

Comment on FR Doc # 2018-16994

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General Comment

September 24, 2018

Director, Division of Spent Fuel Management,
 U.S. Nuclear Regulatory Commission,
 Washington, D.C., 20555-0001

re: NRC Dry Storage and Transportation of High Burnup (HBU) Spent Nuclear Fuel (SNF) Draft Report (NUREG-2224)

Dear Sir/Madam:

It appears that the NRC does not have sufficient information to make cogent regulations concerning the storage and transportation of high burn-up fuel that would be fair to industry and still protect the safety of human beings and the environment.

It would seem that the NRC should have reliable data concerning the long-term storage of high burnup fuel. It is my understanding that the vast majority of high burnup fuel is still in fuel pools, and that the remainder

has been in dry cask storage for a number of years, rather than several decades. Please advise if there have been any independently reviewed studies of high burnup fuel in canisters under various weather and physical site conditions over time.

It is also my understanding that the vertically stored canisters are transported horizontally. Are there credible studies as to high burnup fuel when placed horizontally? Have any of these studies covered the dynamics of high burnup fuel being transported? If so, what were the conditions?

Please reply as soon as is practicable.

Sincerely Yours,
Peter D. Wolf