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 ADD= Wendy Reed,
 Ricardo Torres

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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-0002

Comment on FR Doc # 2018-16994

Submitter Information

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Submitter's Representative: D D'Arrigo

Organization: NIRS +18 Organizations

General Comment

See attached request from 19 organizations and from individuals for Extension of Comment Period until Feb 1, 2019 on NUREG-2224 Dry Storage and Transportation of High Burnup Fuel

Attachments

Docket 2018-0066-0001 extension request for NUREG-2224 ff

Nuclear Information and Resource Service
Sierra Club National Nuclear Free campaign
Beyond Nuclear * Citizens Environmental Coalition
San Onofre Safety * Council on Intelligent Energy & Conservation
Don't Waste Michigan * Promoting Health And Sustainable Energy
Sustainable Energy & Economic Development Coalition * Crabshell Alliance
San Luis Obispo Mothers for Peace * Nuclear Watch South
Tennessee Environmental Council * Hudson River Sloop Clearwater, Inc
Women's International League for Peace and Freedom, Detroit Branch
Proposition One * Lone Tree Council * Great Lakes Environmental Alliance
Committee to Bridge the Gap

Wendy Reed
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US Nuclear Regulatory Commission
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Submitted via Regulations.gov

September 20, 2018

RE: Extension request for NRC-2018-0066-0001, comments on NUREG-2224 Storage and Transport of High Burnup Fuel; 83 FR 154:39475-6, 8-9-18

Dear Wendy Reed and the US Nuclear Regulatory Commission:

This is a request from several organizations to extend the public comment period on Draft NUREG 2224 Dry Storage and Transportation of High Burnup Spent Nuclear Fuel (HBU SNF) until February 1, 2019.

We appreciate the opportunity to provide input on this important NUREG, which we understand will not simply be added to, but will replace, existing references and guidance. We ask for additional time due to the complexity of the issue, the reliance on other documents and reports requiring simultaneous acquisition, review and analysis, the expected release of a report on high burnup fuel by the Nuclear Waste Technical Review Board in the coming months and the timing of other closely related NRC comment and intervention periods now and this fall to which some groups are committed.

For years, many of our public interest and environmental groups have been calling for more information and analysis of high burnup fuel since it became commonly known that it is regularly being generated and that it can have greater or different reactions in various storage and transport scenarios. We welcome the chance to be involved in the development of this important pivotal guidance document and understood from the public meeting/webinar held on NUREG 2224 earlier this September that the NRC staff strongly encourage and welcome public input. Several of our organizations intend to provide detailed technical comments, but need additional time to do so.

Both the Federal Register notice and the NUREG draft refer to numerous other technical documents, each of which we would like to review in order to make sense of, clarify or verify the assumptions and conclusions being made in NUREG-2224.

At a recent public meeting on Waste Control Specialists emergency planning it was pointed out by NRC staff that the avenues for public comment on transport are during the NRC processes developing guidance and certifying containers and related industry/NRC activities. It is, in some cases, "too late" to raise some concerns during licensing because that licensing relies on previously existing guidance and regulation. Thus we greatly desire to seriously engage at this stage. Since several of our nonprofit, largely volunteer organizations are also actively engaging on related NRC scoping and licensing procedures, we request that this NUREG comment deadline be extended.

We sincerely want to provide technical and specific input and need additional time to gather and evaluate referenced documents, to seek technical professional assistance for some aspects and to seek NRC staff assistance for some potential data gaps.

Finally, the Nuclear Waste Technical Review Board will be releasing a high burnup fuel report in the months to come, which we would like to incorporate into our reviews.

Extending the comment deadline until Friday, February 1st would give time for all of the above to a much greater degree than the current deadline. Please consider this request and let us know as soon as possible of your decision.

Sincerely,

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Susan Corbett, Sierra Club National Nuclear Free campaign, reindeargirl @ gmail.com

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Glenn Carroll, Nuclear Watch South, GA, atom.girl @ nonukesyall.org

Ellen Thomas, Proposition One Campaign for Nuclear Weapons Abolition and Economic and Energy Conversion, for a Safe, Sane, and Prosperous Future, et @ prop1.org

Don Safer, Tennessee Environmental Council, dsaferr @ comcast.net

Laura Dewey, Women's International League for Peace and Freedom, Detroit Branch, MI

Terry Miller, Lone Tree Council, MI

Tanya Keefe, Great Lakes Environmental Alliance

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