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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

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General Comment

See attached file(s)

Attachments

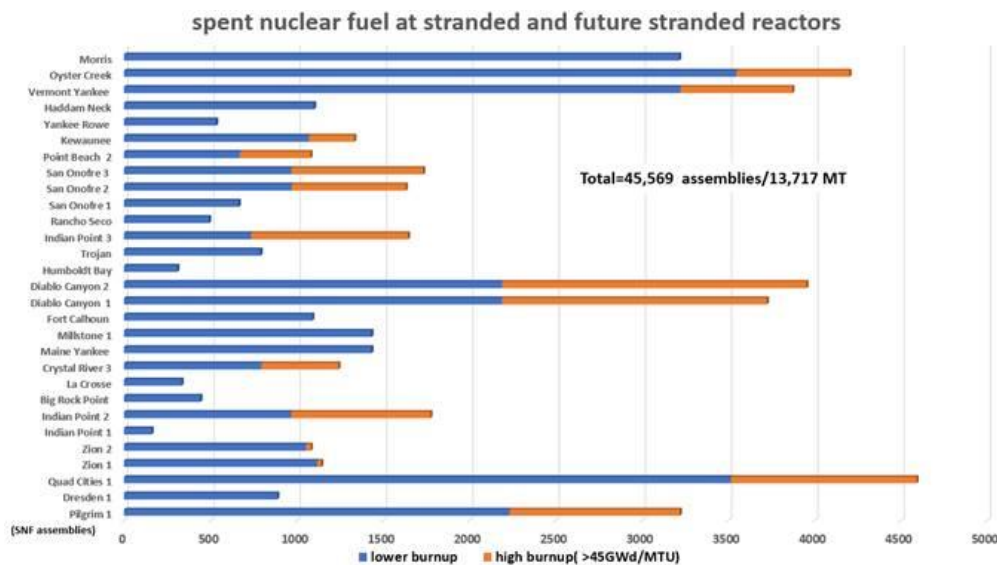
PW Comment NRC 2018 0066 HBU Spent Fuel 09.24.18

Docket ID: NRC-2018-0066

Pilgrim Watch/Town of Duxbury Nuclear Advisory Committee Comment NUREG-2224, Dry Storage and Transportation of High Burnup Spent Nuclear Fuel, Draft Report for Comment (Docket ID: NRC-2018-0066) September 24, 2018

Pilgrim Watch (“PW”) is a non-profit citizen’ organization that serves the public interest on issues regarding the Pilgrim Nuclear Power Station specifically and on nuclear power in general. The organization is located at 148 Washington Street, Duxbury, Massachusetts, 02332. Its membership extends throughout the Commonwealth. The Board of Selectmen appoint the Town of Duxbury Nuclear Advisory Committee to advise on radiological emergency response and all other matters pertaining to the potential impact on the town from the Pilgrim Nuclear Power Station, located near Duxbury.

According to DOE, Pilgrim, like other operating reactors, in recent years is using high burnup spent nuclear fuel.¹ It is already loaded into dry casks and more will be loaded soon; yet, we understand from Robert Alvarez that the NRC is just starting to test to see whether the casks can handle it, with results not in until 2027.²



¹ Spent Power Reactor Fuel: Pre-Disposal Issues, Robert Alvarez, Institute for policy Studies, March 3, 2017 at http://www.lasg.org/waste/Alvarez_SNF_closed_reactors_rev3_3Mar2017.pdf

² Ibid.

Despite NRC's assurance of safety of HBU spent fuel for storage and transport for 60 years, we have several questions that we respectfully ask NRC to answer by providing the technical bases for its responses.

We were disappointed to find that NUREG-2224, Dry Storage and Transportation of High Burnup Spent Nuclear Fuel, Draft Report for Comment (Docket ID: NRC-2018-0066) September 24, 2018 is essentially devoid of facts and seemingly finds it acceptable to ask the public to simply "trust us."

Questions and Comment:

- 1. What are the technical bases for NRC's assurance that HBU spent fuel is safe for storage and transport for 60 years?³ What about safety after 60 years? NRC's [Continued Storage of Spent Nuclear Fuel GEIS](#) concluded safety would be maintained indefinitely?**
- 2. How long does HBU spent fuel need to cool in the spent fuel pool before being placed into dry casks?** Entergy and Holtec International said Pilgrim's spent fuel pool would be emptied in approximately **three years** following defueling. Yet, NRC's Daniel Schroder said (September 13, 2018) a "**five -year** cooling time would be a reasonable time that is often associated with this situation when the fuel can be offloaded into casks for storage" in response to Clearwater.

Dear Ms. Greene:

I am writing in response to your August 15, 2018, email to Mr. Daniel Collins regarding answers to questions posed at the most recent Indian Point Annual Assessment Meeting. Attached to this email is the public meeting summary dated July 19, 2018. An enclosure to the meeting summary includes responses to public topics of interest and questions posed at the Annual Assessment Meeting.

Unfortunately, due to security concerns, we are limited to what we can say in the public regarding high burn-up fuel, and whether or not it is used at a specific site. Regarding your concern about how long fuel remains in the fuel pools before transferring to dry cask storage, a five- year cooling time would be a

³ NRC Presentation Slides Dry Storage & Transportation of High Burnup -- 9/6/18 meeting, slides 14 & 15

reasonable time that is often associated with this situation when the fuel can be offloaded into casks for storage.

Thank you for your email. I hope the attached meeting summary provides you the answers you are looking for regarding your concerns.

Sincerely,

Daniel Schroeder

What is the correct answer – 3, 5 or more years - and what is the technical bases? We are in favor of rapid transfer of the fuel from the pool to dry casks; but we want assurance that the transfer of HBU fuel will be safe and NRC has a technical base.

3. Should HBU spent fuel be packaged as “damaged fuel?” What are the technical bases for your response?

Both Maine Yankee and Zion store its HBU spent fuel as if it is already damaged, in double containment. Is there something unique about Maine Yankee’s and Zion’s HBU fuel that does not apply to Pilgrim or to other reactors? More generally, why doesn’t NRC require all HBU spent fuel packaged as “damaged fuel?” It would be especially prudent to do so. NRC has not yet performed all its tests on HBU spent fuel storage. There is not yet an available permanent or consolidated storage site and may not be one in sixty years or a lot longer. Please provide the technical bases for your response.

We look forward the NRC’s responses.

Respectfully,

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