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Docket: NRC-2016-0231

Waste Control Specialists LLC's Consolidated Interim Spent Fuel Storage Facility Project

Comment On: NRC-2016-0231-0187

Interim Storage Partners LLC's Consolidated Interim Spent Fuel Storage Facility

Document: NRC-2016-0231-DRAFT-0201

Comment on FR Doc # 2018-19058

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General Comment

I have lay knowledge of the nuclear power industry and its environmental effects. Interim Storage Partners comments "To fully support the continued generation of clean air nuclear energy in the United States, our nation will need multiple, flexible used fuel management resources while developing a permanent federal repository" (<https://www.eenews.net/stories/1060096457>). The commercial nuclear industry has a sorry track record of safety and quality control in an operating environment that is unforgiving of error, and a nonexistent track record on developing competent plans for permanent spent fuel disposal solutions - hence the need to address spent fuel languishing in holding ponds at reactors across the nation. The direction for commercial nuclear power generation in the United States should be to end it, since the nuclear industry has failed to invest in the systems and processes needed to keep it from being a burden for future generations. ISP's statement suggests that these temporary storage facilities are being viewed as an enabler for continued commercial nuclear power generation, or even its expansion. Nuclear power is not a viable solution to global warming because it replaces one waste stream with another. Further, given the nuclear industry's history, one may reasonably suspect that once the temporary storage facilities are established and the spent fuel shipped there, the public relations problem of storage at reactor sites will have been solved, and the pressure to drive to a permanent solution will be greatly reduced.

I suggest the following areas should be included in the review scope for this project:

1.: security:

1.a: an illustration in the document cited above shows spent fuel containers arrayed above ground in a dense array. We've had terrorists fly planes into buildings. How will an above-ground facility be secured against aerial attack ? With a 100%-effective antiaircraft defence ? To safeguard a field full of dirty bombs waiting to be set off ? Even if they're in "stinking nowhere" it might not be great to have the fallout reach Dallas.

1.b: how will transports from reactors across the country be secured ? A brief review of public literature about

naval reactor fuel transport describes precision engineering and dedicated transport processes and facilities being employed to safeguard those shipments. Will the same level of organization and process and technology development be employed to safeguard movement of what will presumably be a much greater volume of commercial spent fuel, traveling along a far greater diversity of routes, or will corners be cut ?

1.c: the project implicitly envisions shipping nuclear fuel from all over the United States. The tracking of shipments had better be ironclad. Above a certain volume of shipments, security through obscurity will not be something to rely on.

2.: accidents:

2.a: in that operating environment of transportation along a diversity of routes, how will adequate emergency plans be developed for the entirety of each route ? Where will the resources needed to address a transport accident be drawn from, how will they arrive on scene and in what timeframe, and of what scale do they need to be to reasonably guarantee a successful response ? It doesn't even need to involve exposure of nuclear material: how do we respond to a derailment that leaves a spent fuel container sitting, intact, in the middle of a cornfield ?

3.: permanence:

3.a: a permanent solution to spent fuel disposal needs to be found regardless of the trajectory of the commercial nuclear power industry. For the purposes of this project, it should be required that a terminal state be identified other than the temporary storage facility. In fact, skip the temporary facility entirely, adopt or develop the technology needed for permanent safe disposal, and end the commercial nuclear experiment with the conclusion that it was a valiant effort to harness energies that our economy and society in their current state are not competent to work with - we lust after the potential gain but fail to mitigate the attendant risks in anything approaching an adequately responsible fashion; we externalize costs in the form of an inherited mess for succeeding generations, and meanwhile enjoy the moment, making money and wasting electrical power. This is inadequate and does not serve the public interest.