

PUBLIC SUBMISSION

SUNSI Review Complete
Template = ADM-013
E-RIDS=ADM-03
ADD= Antoinette Walker-
Smith, James Park,
Cinthya Cuevas Roman,
Jenny Weil

COMMENT (31)
PUBLICATION DATE:
9/4/2018
CITATION 83 FR 44922

As of: 10/12/18 6:37 AM Received: October 11, 2018 Status: Pending_Post Tracking No. 1k2-95x7-161i Comments Due: October 19, 2018 Submission Type: Web

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-0211

Comment on FR Doc # 2018-19058

Submitter Information

Name: Gregory Esteve

Address:

3655 North Scenic Highway

Lake Wales, FL, 33898

Email: gregesteve@outlook.com

General Comment

Even routine or incident-free shipments of irradiated nuclear fuel carry health risks to workers and innocent passers by. This is because it would take so much radiation shielding to completely hold in the gamma radiation, being emitted by the highly radioactive waste, that the shipments would be too heavy to move economically.

NRCs regulations allow for up to 10 millirem per hour (mR/hr) of gamma radiation to be emitted, about six feet (two meters) away from a shipping casks exterior surface. That's about one to two chest X-rays worth of gamma radiation, per hour of exposure.

Since the radiation dissipates with the square root of the distance, this means that NRCs regulations allow for up to 200 mR/hr, at the surface of the casks exterior. That's 20 to 40 chest X-rays worth of gamma radiation, per hour, which NRC allows to stream out, right at the casks surface.

In these ways, that 200 mR/hr permissible dose rate could impact not only workers, but even members of the public.

In this sense, even routine or incident-free shipments of irradiated nuclear fuel can be considered as similar to mobile X-ray machines that can't be turned off, a phrase describing the concept first expressed by Lauren Olson, a supporter of NIRS.

To make matters worse, there have been large numbers of shipments, externally contaminated with radioactivity, making their actual dose rates much higher and thus more hazardous in serious violation of the already compromised permissible or acceptable levels.