SUNSI Review Complete Template = ADM-013 E-RIDS=ADM-03 ADD= Wendy Reed, Ricardo Torres

PUBLIC SUBMISSION COMMENT (21) PUBLICATION I 8/9/2018

E-RIDS=ADM-03ADD= Wendy Reed,
Ricardo TorresAs of: 11/13/18 7:29 AM
Received: November 09, 2018COMMENT (21)
PUBLICATION DATE:
8/9/2018
CITATION: 83 FR 3947As of: 11/13/18 7:29 AM
Received: November 09, 2018
Tracking No. 1k2-96gs-qw46
Comments Due: November 09, 2018
Submission Type: Web

Docket: NRC-2018-0066

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

Comment On: NRC-2018-0066-0016 Dry Storage and Transportation of High Burnup Spent Nuclear Fuel

Document: NRC-2018-0066-DRAFT-0022 Comment on FR Doc # 2018-21974

Submitter Information

Name: Michel Lee Submitter's Representative: Michel Lee Organization: Promoting Health and Sustainable Energy (also Council on Intelligent Energy & Conservation Policy)

General Comment

Promoting Health and Sustainable Energy (PHASE) has joined in the Comments of Alliance for a Green Economy, Citizens Environmental Coalition, Dont Waste Michigan, Hudson River Sloop Clearwater, Indian Point Safe Energy Coalition, Manhattan Project for a Nuclear Free World, Nuclear Information & Resource Service, and San Onofre Safety.

These Supplemental Comments are filed to emphasize PHASEs concern over the failure of the Nuclear Regulatory Commission (NRC) to conduct any sort of all hazards analysis relevant to the issues of transport and storage of high burnup (HBU) nuclear fuel. (In fact, to our knowledge, there has never even been such an evaluation made regarding the far less hot and radioactive low burnup fuel.) We commend the effort of the NRC and the national laboratories to contribute data to the state of engineering knowledge about behavior of HBU under certain lab testing conditions. However studies done to date neither assure the safety of transporting tens of thousands of tons of spent fuel by train, truck, and barge, in transport canisters (adding substantially more tonnage) over thousands of miles of aging and deteriorated rail, bridge, and road infrastructure over the course of decades, nor the wisdom of then dumping this extraordinarily hazardous material at interim sites to sit en masse very likely well into the next century or beyond.

We urge the NRC to task a multi-disciplinary expert independent body such as the National Academy of Sciences, Engineering, and Medicine to conduct a full hazards analysis of such a scheme, with attention to the (1) health (2) safety and (3) national security interests of the nation at large.

(1) HEALTH: The apparent plan is to permit the nuclear industry to expose millions of Americans to excess levels of radioactivity along many routes of transport. The elevated risk of cancer, developmental disorders, immune system injury, and other radiation dose exposure-linked health effects is likely to be consequential at a population level. As experts, including those of the National Academies, have noted, women, adolescents, children, girls, pregnant women, infants, and babies in utero are particularly vulnerable to the effects of radioactivity. Families living near transport routes will be exposed to excess radioactivity as a matter of ordinary course. Traffic, infrastructure problems (e.g., damaged rail, broken down vehicles) and weather conditions will inevitably result in HBU being stuck in place en route or at depots. This will result in extended exposures for workers and members of the public.

(2) SAFETY: Strong scientific consensus predicts increasing frequency and severity of extreme weather and natural disaster conditions over coming decades. Relocating massive quantities of extraordinarily hot and radioactive material under such conditions is a risk magnifier. One need only consider what transpired during hurricanes Florence and Michael in 2018 with unanticipated sudden historic storm surges, wide-geographic-scale flooding, landslides causing road and rail blockages, and a CSX train derailment to apprehend this reality. Storage of HBU at sites in the American West, predicted to experience rising levels of extreme heat, drought, storms with severe winds, and wildfires, adds another dimension of risk mandating serious evaluation.

(3) SECURITY: We are barely past the 17 year anniversary of 9/11, yet the NRC seems to have become oblivious to the potentially catastrophic possibility of terrorism. The 9/11 Commission observed that the 2001 attack on the United States revealed four kinds of failures: in imagination, policy, capabilities, and management. Of these failures, the 9/11 Commission stressed imagination as the most important, noting, It is therefore crucial to find a way of routinizing, even bureaucratizing the exercise of imagination. The failure evident in the entire conceptualization of transport and interim storage of HBU at sites distal from the points of origin all over the United States exceeds the level of failure of imagination and enters the dimension of willful blindness.

Nineteen men armed with only knives and box cutters were able to transform the instruments of the nation's safest form of transportation into missiles which successfully attacked New York City and the Pentagon. What level of complacency, denial or hubris does it take to ignore the possibility that far more resourced, sophisticated malevolent actors, armed with cyberattack capability and detailed knowledge of our nations deteriorated transportation and gas pipeline infrastructure would not be able to initiate, or at least exploit, the dirty bombs this entire high-level radioactive waste enterprise would be advancing?

The risks noted above are those which are evident to most lay persons. Undoubtedly, experts in the fields of medicine, disaster science, and national security will flag others. Such independent analysis is urgently needed.