

## RulemakingComments Resource

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**From:** Donna Gilmore <donnagilmore@gmail.com>  
**Sent:** Wednesday, March 13, 2019 11:25 PM  
**To:** RulemakingComments Resource; Allen, William; Lohr, Edward  
**Cc:** Mike Levin; Hutt, Heather (Harris); Jeff McDonald; Teri Sforza; Joseph Street; Toni Iseman; Decommission; CHAIRMAN Resource; CMRBARAN Resource; CMRCaputo Resource; CMRBurns Resource; Ace Hoffman; Len Hering; Gregory Jaczko; Tom English; Subrata Chakraborty; Bart Ziegler; Layton, Michael  
**Subject:** [External\_Sender] NUHOMS canister system CoC 1029, Amendment 4 Docket ID NRC-2018-0265 Areva TN Americas Donna Gilmore comments

License Amendment 4 will eliminate the requirement to report peak radiation levels from the outlet air vents of the Areva TN Americas NUHOMS canisters at San Onofre and elsewhere. Through-wall cracks in canisters will have highest radiation readings from the outlet air vents. What is the purpose of not reporting peak levels from the outlet air vents other than to hide high radiation levels?

I have requested the NRC provide radiation levels of the outlet air vents at San Onofre. The NRC has repeatedly refused to share the outlet air vent radiation levels of the NUHOMS canisters that are up to 15 years old. Why? Are they already leaking? What are you hiding?

The NUHOMS canisters at Calvert Cliffs in Maryland are up to 27 years old. They already have approval to hide peak radiation levels from the outlet air vents. Are those already leaking? What are the radiation levels from the outlet air vents of those canisters?

The NRC on August 5, 2014 stated once cracks start in canisters they can grow through the wall in 16 years. At the time they said it would be 30 years before canisters would be cool enough for moist salt air to start the corrosion cracking process. However, with the EPRI investigation of a 2-year old Diablo Canyon canister that already had a low enough canister temperature and corrosive salt particles, you know your 30 year estimate is wrong. Why do you continue to ignore this issue?

August 5, 2014 NRC Meeting Summary

<http://pbadupws.nrc.gov/docs/ML1425/ML14258A081.pdf>

Diablo Canyon: conditions for stress corrosion cracking in 2 years

<https://sanonofresafety.files.wordpress.com/2011/11/diablocanyonscc-2014-10-23.pdf>

Amendment 4 will eliminate the requirement for a spent fuel pool once pools are empty. Why isn't there a requirement to have a hot cell on-site or a pool on-site in case of need to replace canisters? To assume there will not be through-wall cracks or other failures of the canisters or a need to repackage fuel for transport is not justified. As you know, either a pool or hot cell is required for these conditions.

The Nuclear Waste Policy Act requires the ability to retrieve fuel assemblies for the purpose of transporting the fuel to another site by the DOE. Why are you eliminating the only method to comply with this law?

These Sierra Club comments to the NRC busted the NRC false assumptions that nothing can go wrong once fuel is in dry storage. Why are you ignoring them?

Sierra Club comments to NRC proposed rule for regulatory improvements for decommissioning power reactors, Docket NRC-2015-0070, March 2016

<http://www.nrc.gov/docs/ML1608/ML16082A004.pdf>

Amendment 4 eliminates the requirement of daily visual inspections of air vents. Why are you only requiring temperature monitoring? Previously, you required both. Why did you previously require both, but now you don't? Why are you reducing safety?

This approval allows increased temperatures. Why are you allowing increased temperatures? What was the reason you required lower temperatures previously? Why are you reducing safety?

At the NRC RIC Conference on March 12, 2019, during the Q&A for NRC Chairman Svinicki, it was mentioned that one of the improvements NRC employees would like to see is for their management to have the courage to do the right thing. Please heed your employees' requests for our safety and yours by denying license Amendment 4 and amending any others you have approved that lowered these safety standards.

Also, please see petition to recall the Holtec canister system at San Onofre. The system is a lemon and must be replaced. Holtec's lack of a precision downloading system unavoidably causes the walls of all canisters to be damaged the entire length of the canister wall as they are downloaded into the storage holes. Michael Layton confirmed the NRC approved this system and told me he didn't know whether the NRC knew that the Holtec system was not a precision downloading system. All the above-ground Holtec systems may likely have a similar problem, based on my research of the HI-STORM 100 FSAR. The NRC needs to reevaluate their policy of giving exemptions to destroy spent fuel pools. Rejecting Amendment 4 would be a good start.

<https://www.change.org/p/san-onofre-nuclear-waste-recall-defective-storage-system>

Thank you,

Donna Gilmore  
SanOnofreSafety.org

Docket NRC-2018-0265: TN Americas LLC Standardized Advanced NUHOMS System, Certificate of Compliance No. 1029, Amendment No. 4

The U.S. Nuclear Regulatory Commission (NRC) is proposing to amend its spent fuel storage regulations by revising the TN Americas LLC Standardized Advanced NUHOMS® Horizontal Modular Storage System (NUHOMS® System) listing within the "List of approved spent fuel storage casks" to include Amendment No. 4 to Certificate of Compliance No. 1029. Amendment No. 4 revises the certificate of compliance's technical specifications to: Clarify the applicability of unloading procedures and training modules relative to spent fuel pool availability; credit the use of the installed temperature monitoring system specified in lieu of performing daily visual vent inspections; establish dose rates on the front inlet bird screen and the door of the concrete storage module for the Advanced Horizontal Storage Module; modify the criteria for performing Advanced Horizontal Storage Module air vent visual inspections; identify the blocked vent time limitations for each of the 24PT1 and 24PT4 dry shielded canisters; and provide a new temperature rise value for the Advanced Horizontal Storage Module with a loaded 24PT4 dry shielded canister.

Submit comments by January 28, 2019. Comments received after this date will be considered if it is practical to do so, but the NRC is able to ensure consideration only for comments received on or before this date.

This proposed rule is limited to the changes contained in Amendment No. 4 to Certificate of Compliance No. 1029 and does not include other aspects of the TN Americas LLC Standardized Advanced NUHOMS® System design. Because the NRC considers this action to be non-controversial, the NRC is publishing this proposed rule concurrently with a direct final rule in the Rules and Regulations section of this issue of the Federal Register. The direct final rule will become effective on March 12, 2019. However, if the NRC receives significant adverse comments on this proposed rule by January 28, 2019, then the NRC will publish a document that withdraws the direct final rule. If the direct final rule is withdrawn, the NRC will address the comments received in response to these proposed revisions in a subsequent final rule. Absent significant modifications to the proposed revisions requiring republication, the NRC will not initiate a second comment period on this action in the event the direct final rule is withdrawn.

A significant adverse comment is a comment where the commenter explains why the rule would be inappropriate, including challenges to the rule's underlying premise or approach, or would be ineffective or unacceptable without a change. A comment is adverse and significant if: (see link)

<https://www.regulations.gov/document?D=NRC-2018-0265-0001>