CHAIRMAN Resource

From:	Donna Gilmore <donnagilmore@gmail.com>
Sent:	Tuesday, April 09, 2019 2:30 PM
To:	Morris, Scott
Cc:	CHAIRMAN Resource; CMRBARAN Resource; CMRCaputo Resource; CMRWright Resource; CMRBurns Resource; Layton, Michael; Dunn, Darrell; Terry Lodge; Teri Sforza - OC Register; Sean Ansted (Harris); Heather J. Hutt (Harris); mike@mikelevin.org; Jonathan Gilbert; Francine Busby; Kyle Krahel-Frolander; Len R. Hering; Gregory Jaczko; Jordan P. Ingram; Toni Iseman; Steve Swartzs; Dan Bane; Debra Lewis; Shari Horne
Subject:	[External_Sender] NRC Scott Morris comments about Holtec system at San Onofre

Please provide the specific ASME nuclear pressure vessel codes or other ASME codes you are referring to in your video below regarding the conditions for allowing scratches or abrasions in these Holtec thin-wall nuclear pressure vessel canisters.

Scott Morris NRC Video
https://youtu.be/j1VzhVPeDEw

Also, please include text for those codes, since the general public does not have access to that information.

The NRC grants exemptions to many ASME codes. In fact, these Holtec nuclear pressure vessels do not have ASME N3 stamps, as you inferred was probable, in the last San Onofre Community Engagement Panel meeting. They don't even have pressure monitoring or pressure relief valves which, as you mentioned at the CEP meeting, even our hot water heaters have ASME pressure vessel stamps.

Without those features there is no ability to monitor for hydrogen gas buildup or to release the gas in order to prevent the canisters from exploding.

This hydrogen gas buildup is caused from the residual water remaining in these canisters after drying. No one knows how much water or moisture is in these canisters, since they are welded shut. The Nuclear Waste Technical Review Board is concerned about this issue for both defense and commercial spent nuclear fuel waste containers. See their December 2017 report to Congress and the DOE Secretary regarding Spent Nuclear Fuel Storage and Transport.

The NWTRB recommends all spent nuclear fuel and its containment must be retrievable, maintained and monitored in a manner to prevent radioactive releases and hydrogen gas explosions. The NRC continues to approve thin-wall welded canisters that do not meet these basic and critical safety requirements.

As you probably know, you cannot find or characterize cracks with a camera. At the October 2018 NRC Commission briefing, the NRC staff made it clear to the Commissioners that finding and characterizing cracks (e.g., depth, size, length, direction, etc.) cannot currently be done. Only more promises of future solutions.

NRC Commission October 2018 statements
https://youtu.be/GYeGT5NQW58

Even if you could find cracks, then what? You have no way to repair them. Even Kris Singh, President of Holtec says repairing canisters isn't even feasible, even if you could find them, in the face of millions of curies of radionuclides being released. He said it will just introduce another area for cracking.

Singh video
https://youtu.be/euaFZt0YPi4

Singh transcript of video
https://sanonofresafety.files.wordpress.com/2015/09/attachment-14-declaration-of-donna-gilmore.pdf

See my comments submitted to the NRC regarding NRC Draft NUREG-2224 on High Burnup Fuel Storage and Transport. It includes a link to the NWTRB December 2017 report and other technical information about explosion risks and other storage and transport risks.

Website with NUREG-2224 Comments and live links to all references
https://sanonofresafety.org/nureg-2224-high-burnup-storage-and-transport/

NUREG-2224 Comments document
Nureg-2224amswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18269A037

See also these Sierra Club comments that address concerns about spent fuel management exemptions that are putting us at great risk at San Onofre and elsewhere.

Sierra Club comments to NRC proposed rule for regulatory improvements for decommissioning power reactors, Docket NRC-2015-0070, March 2016 (NRC ML16082A004)
http://www.nrc.gov/docs/ML1608/ML16082A004.pdf

Unless these thin-wall canisters are replaced with proven thick-wall transportable storage casks that have ASME N3 stamps and meet Nuclear Waste Policy Act and NWTRB storage and transport safety requirements, none of us are safe.

These thin-wall canisters are lemons and must be recalled.

The Holtec and other thin-wall canisters must be replaced -- preferably **before** they start having major radioactive releases and hydrogen gas explosions.

So far, all the NRC has done about this issue is allow Edison and others to hide the radiation levels from the outlet air vents of the NUHOMS canister overpacks. This is where radiation levels will be highest from through-wall cracks in aging canisters.

The NRC Region IV has refused to release outlet air vent radiation measurements from the San Onofre Areva NUHOMS canisters, even after multiple requests.

Thick-wall casks survived the Fukushima 2011 tsunami and 9.0 earthquake. Thin-wall canisters have no seismic earthquake rating when partially cracked.

The thick-wall casks at Fukushima were opened to check for damage. Something that cannot be and has never been done with the thin-wall welded canisters.

The Fukushima aluminum alloy fuel baskets showed unexpected premature wear. These baskets are similar to the aluminum alloy baskets used in the U.S. thin-wall canisters. Japan has now banned the use of aluminum alloy baskets, switching to stainless steel baskets. The NRC has yet to address this issue, although they have known about it for years.

Recent claims these canisters are transportable ignores the above issues.

And how many people know that the New Mexico proposed consolidated interim storage system is the same defectively designed system as at San Onofre.

And the New Mexico and Texas CIS plans, and the DOE Pilot plan (written by Holtec and others), have no hot cell or spent fuel pool to replace defective canisters.

The New Mexico and Holtec plan is to return leaking canisters back to sender. You know the "senders" have no plan in place to deal with leaking or otherwise defective canisters. You know it is not safe to transport leaking or cracking canisters filled with high burnup fuel.

It's time to end this charade and tell the ugly truth to elected officials and the public **before** it's too late -- **before** these ticking time bomb "Chernobyl cans" start exploding.

I look forward to your timely response.

Donna Gilmore
SanOnofreSafety.org
949-204-7794
donnagilmore@gmail.com