

From: [Laura Watchempino](#)
To: [RulemakingComments.Resource](#)
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Has the U.S. Nuclear Regulatory Commission (NRC) independently verified that the revised Holtec International HI-STORM 100 Multipurpose Canister Cask System revisions will continue to ensure adequate protection of public health, safety and the environment?

And does the HI-STORM 100 Cask System design approved on May 1, 2000 continue to meet all requirements of 10 CFR 72.214 as outlined in Certificate of Compliance No. 1014 (65 FR 25241)?

More specifically, how will each of Holtec's proposed amendments improve or change the original design that was approved in 2000? And why is each change necessary?

The NRC no longer needs to rely on assumptions about subcriticality, fuel geometry, or environmental conditions that might be encountered.

NRC now has almost two decades of monitoring data to review and answer these questions. A finding of no significant impact under NEPA must be based on an historical data review at all sites where the HI-STORM 100 Cask System is in use, along with all the problems and safety issues encountered at those sites.

For example, adding three new regionalized Quarter Symmetric Heat Load loading patterns for the multipurpose canister (MPC)-68M and reducing the minimum cooling time to 1 year for all fuel types stored in the MPC-68M may not be suitable or protective in warmer climates or dry areas prone to wildfires, and should be based on monitoring data collected from sites with these characteristics.

Allowing the use of a damaged fuel isolator for storing damaged fuel indicates that damaged fuel has been or will be stored within the HI-STORM 100 Cask System. What are the implications for public health and the environment of such a finding and how does damaged fuel affect the HI-STORM 100 Cask System?

How will Holtec's proposed modifications to the number of vents in the overpack affect the specified heat loads of the HI-STORM 100 Cask System? And how will the proposed modifications impact criticality control?

Alternative

The identified alternative is to deny approval of Amendment No. 14, requiring any 10 CFR part 72 general licensee that seeks to load spent nuclear fuel into the new International HI-STORM 100 Cask System as proposed in Amendment No. 14 to request an exemption from the requirements of Sections 72.212 and 72.214.

Under this alternative, interested licensees would have to prepare, and the NRC would have to review, a separate exemption request. The NRC concludes that the environmental impacts would be the same as the proposed action. However, Holtec International is the party requesting to amend Certificate of Compliance No. 1014 for its HI-STORM 100 Cask System, not a nuclear power reactor licensee.

It is unlikely that a general licensee would assume the burden of showing that Holtec's proposed modifications would not significantly alter the design of the cask or prevent loss of containment, shielding, and criticality control in the event of an accident. It is much more likely that nuclear power reactor licensees will use only those spent fuel storage casks that have been approved by the NRC, including the current Holtec International HI-STORM 100 Cask System, unless specific problems have been encountered with the HI-STORM 100 Cask System.

No additional administrative burden would be imposed upon the NR

Thank you for considering my comments,

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