

SUNSI Review Complete
 Template = ADM-013
 E-RIDS=ADM-03
 ADD: Jill Caverly

As of: 4/9/20 2:18 PM Received: April 09, 2020 Status: Pending_Post Tracking No. 1k4-9g13-rq79 Comments Due: May 22, 2020 Submission Type: Web

PUBLIC SUBMISSION

COMMENT (12)
 PUBLICATION DATE:
 3/20/2020
 CITATION 85 FR 16150

Docket: NRC-2018-0052

Holtec International HI-STORE Consolidated Interim Storage Facility Project

Comment On: NRC-2018-0052-0300

Holtec International HI-STORE Consolidated Interim Storage Facility Project

Document: NRC-2018-0052-DRAFT-0320

Comment on FR Doc # 2020-05690

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General Comment

NRC-2018-0052 Reason three: The proposed Holtec HI-STORM UMAX system is already safely used in California and Missouri.

"Dry Cask storage is probably the safest activity one can do in America. The risks are too small to be measured, although we try to assign numbers. But the risks are below any other activity humans engage in, making the relative risks not statistically different from zero." - James Conca.

Nuclear waste containers have been tested over the last 40 years by running them into concrete bunkers at 80 mph, being dropped onto huge steel spikes, burned in jet fuel fires at thousands of degrees, and sunk deep in water for weeks. These things are as strong as humans can make them.

Holtec's HI-STORM UMAX was certified and licensed by the NRC in 2015 and is already deployed at nuclear power plants around the United States, including Callaway Nuclear Generating Station and SONGS. It was engineered to store all of the US used nuclear fuel that has been produced.

HI-STORM UMAX (Holtec International Storage Module Underground MAXimum Capacity) is an underground Vertical Ventilated Module (VVM) dry spent fuel storage system engineered to be fully compatible with all presently certified multi-purpose canisters (MPCs).

HI-STORE CISF is envisioned to unify the storage of all different storage canisters (both vertically and horizontally stored) in one standardized HI-STORM UMAX cavity system simplifying operations and aging management activities. Storing the Nation's used nuclear fuel in the HI-STORM UMAX system is a temporary measure, as the stainless-steel canisters are easily retrievable and ready for transport pending the determination of a safe permanent solution for managing used nuclear materials. The canisters are designed, qualified, and tested to survive and prevent the release of radioactive material under the most adverse accident scenarios postulated by NRC regulations for both storage and transportation.

HI-STORE CISF will be licensed in 40-year increments. The HI-STORM UMAX system will last several times longer than that while the highly radioactive fission products slowly decay within 300 years to a fairly lower transuranic manageable stored nuclear fuel.

It is my opinion that the stored nuclear fuel in HI-STORE CISF will eventually be retrieved, not for another longer-term storage facility, but reused as feed stock for a molten salt fuel conversion facility adjacent to the storage site.