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Holtec International HI-STORE Consolidated Interim Storage Facility Project

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Holtec International HI-STORE Consolidated Interim Storage Facility Project

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General Comment

NRC-2018-0052 Reason seven: Holtec's "super safe" rail carrier now has 12 axles with a cask cage on an extra-strong frame.

For decades, DOE/DOD transuranic waste and Naval spent nuclear fuel has been transported by rail on an eight axles (16 wheels) rail carrier without incident. With the proposed consolidation of commercial spent nuclear fuel, Holtec has taken an added precaution to beef up the transport carrier to diffuse any objections that it is not safe enough. The overall frame has been strengthened and additional axles and wheels added with a newly designed safety cage. There is no safer rail car on the tracks.

While Holtec is responsible for the transport carrier, Burlington Northern Santa Fe (BNSF) is responsible for the thousands of miles of tracks the specialty trains will travel. At this time there is not an EIS defined to address any additional safety procedure beyond those in place for existing radioactive waste and SNF transports with the Federal Transportation Administration (FTA). At some point after the final licensing of the HI-STORE CISF, additional environmental impact studies will probably be conducted. I am sure there will be opposition to be resolved.

In most of the sample illustrations and actual testing trains, there is only one cask being transported at a time. The specialty trains usually consist of an engine, security personnel car and a single cask transport carrier. It is my opinion that it would be more cost-effective to have multiple cask carrier cars, the number to be determined by what is safe to handle in an emergency. It may also be reasonable to have a second engine at the rear of the train to assist with pushing as well as a rear buffer.

It is very important the BNSF maintains a Class 1 status on all the lines that transport spent nuclear fuel

destine for HI-STORE CISF. The FRA provides a statistical mapping of every imaginable situation. If you are curious about the safety of any segment of any rail line anywhere, it is easily mapped for you. This will be of great value to help those concerned about railroad safety, especially along the routes to be taken by the DOE specialty trains.