

**From:** [Barbara Warren](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID-2021-0036-0001  
**Date:** Monday, March 08, 2021 4:17:20 PM  
**Attachments:** [NRC LTR re Holtec License Transfer Palisades & Point Beach Incident Drop Load.pdf](#)  
[NRC LTR re Holtec License Transfer Palisades & Point Beach Incident Drop Load.docx](#)

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I tried to use the regulations.gov website to submit comments, but it kept saying it did not recognize some alphanumeric characters. I have attached the comments here—pdf and word.

Barbara Warren

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March 8, 2021

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Submitted via <https://www.regulations.gov/document/NRC-2021-0036-0001>

Attention: Rulemakings and Adjudications Staff: *Docket ID NRC-2021-0036-0001*

We urge NRC to conduct a thorough investigation of Holtec's past work performance and its nationwide plans to handle an extraordinary assortment of major nuclear reactor projects and massive nuclear waste projects that have no record of acceptable performance. The future we see is one which includes a nuclear catastrophe – which should never occur in the uniquely valuable and irreplaceable Great Lakes. We strongly oppose the transfer of licenses and ownership, from current owner Entergy Nuclear to proposed new owner Holtec International, for the Palisades and Big Rock Point sites, located in Covert Township, Van Buren County, near South Haven, and in Hayes Township, Charlevoix County, near Charlevoix and Petoskey, respectively.

We are writing primarily to describe a major severe performance failure on the part of Holtec, which occurred over many months and jeopardized the health and safety of the workforce at the San Onofre nuclear reactor complex in California.

**Prior event:** It should also be noted that a significant error occurred a short time prior. Holtec was also the manufacturer of the stainless steel canisters to be used at San Onofre. One requirement for manufacturers of stainless steel canisters used for spent nuclear fuel is a complete inspection prior to shipment to the reactor/ dry storage facility. After reaching the San Onofre nuclear plant the new canisters were loaded with spent nuclear fuel. It turned out that the canisters were never inspected and loose parts were present in the canisters. During transportation loose parts could damage the canisters and the spent nuclear fuel as a result of vibrations and shocks that naturally occur with transport. No action was taken by Holtec or by NRC to require the removal of the loose parts prior to transport.

**August 3, 2018 Holtec's Potential Load Drop Incident involved the loading of Spent Nuclear Fuel into the Hi-Storm UMAX cask system. This was a very serious event which could have been catastrophic. The writer of this report, Barbara Warren, participated in an NRC public meeting related to an investigation.**

The Final Safety Analysis Report (FSAR) dated June 27, 2018 preceded the event by approximately one month.

Key requirement: The FSAR requires redundant drop protection.

**Key Issues:**

- The loss of redundant drop protection was an unanalyzed condition because it was never supposed to occur.
- Holtec had a full service contract with the utility, Southern California Edison, for all handling of spent nuclear fuel and radioactive waste as well as management of the dry storage facility.
- Multiple problems occurred over 7 months prior to the Aug. event, but were never reported as required to NRC.
- Insertions into the UMAX system produced considerable noise because of contact and scraping of the canister. Such scratching and gouging can result in damage that accelerates corrosion and shortens the life of the canisters—the primary containment for the high level radioactivity.
- No Reporting to NRC of ongoing problems that occurred in the months prior to Aug. 3<sup>rd</sup>.
- The root cause of the problem was due to a change to the Hi Storm UMAX system—with the addition of a shield ring at the entrance to the cask. It is not clear to us that NRC actually approved this particular engineering design change. Workers were trained on an earlier model of the UMAX system which had a total clearance of 1 inch for the approximate 5 ft. diameter of the canister. This 1 inch clearance was no longer present when the shield ring was added. Then the workers had just ¼ of an inch or 0.25 of an inch of space to insert the canister. Workers received no training for the actual UMAX system, that was used with this limited clearance.
- 29 stainless steel canisters which cost millions of dollars were damaged, but NRC never required detailed study of the actual condition of the canisters.
- Workers performing the task of inserting the canister into the UMAX system had very limited visibility and believed the canister had been inserted, when it was hanging in mid-air by straps. The workers involved received high radiation

exposures as a result. Those supposedly supervising the operation had even less visibility.

- NRC imposed multiple severe violations on Southern California Edison, the utility operating the reactors.
- This situation involved a fundamental engineering design problem and NRC should have required Holtec to review the entire engineering design and recommend appropriate engineering changes. The severely limited space for insertion related to the late modification involving the new shield ring. Such limited space requires rigid equipment for insertion - not flexible straps. Workers were given an impossible task with almost no visibility.

**Important Note:**

Despite Holtec's extensive involvement which included failure to adequately train workers involved and the near impossibility of success with the insertion process, NRC did not choose to cite Holtec for its multiple failures. Nor did NRC, require engineering design changes for the insertion of canisters into the UMAX system.

Of particular importance Holtec plans to use this same system at a new Consolidated Interim Storage Facility in New Mexico to potentially store 100,000 metric tons of Spent Nuclear Fuel. Any damage to stainless steel canisters could accelerate corrosion and impact future storage at a CIS facility. However, NRC ignored the implications of this event on future Holtec plans for a CIS facility, where many canisters may fail leading to radioactive leaks and extensive radioactive contamination.

We urge all public officials in the Great Lakes region to oppose all extended and new projects that involve nuclear reactors and nuclear waste. It is time to restore the Great lakes not risk nuclear catastrophe in such an irreplaceable resource. Thank you for your attention.

Sincerely,

A handwritten signature in black ink, reading "Barbara J. Warren". The signature is written in a cursive, flowing style.

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