

WCO outreachCEM Resource

From: Cummings, Kristopher W [cumminkw@westinghouse.com]
Sent: Friday, February 17, 2012 12:57 PM
To: WCO outreach Resource
Subject: Westinghouse Comments on Draft NRC Report
Attachments: LTR-NRC-12-17.pdf

Ms. Pineda,

Attached is the Westinghouse letter transmitting comments of the NRC Draft Report, "Background and Preliminary Assumptions for an Environmental Impact Statement – Long Term Waste Confidence Update".

Email Confirmation of receipt of this transmittal would be appreciated.

Sincerely,

Kristopher Cummings

Manager, Fuel Engineering Licensing
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Federal Register Notice: 99FR99992
Comment Number: 29

Mail Envelope Properties (F7EB8A049E9359429C11C733F516E97B0AE8365E5E)

Subject: Westinghouse Comments on Draft NRC Report
Sent Date: 2/17/2012 12:56:45 PM
Received Date: 2/17/2012 12:57:22 PM
From: Cummings, Kristopher W

Created By: cumminkw@westinghouse.com

Recipients:
"WCO Outreach Resource" <WCO Outreach.Resource@nrc.gov>
Tracking Status: None

Post Office: SWEC9982.w-intra.net

Files	Size	Date & Time
MESSAGE	667	2/17/2012 12:57:22 PM
LTR-NRC-12-17.pdf	126959	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:



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LTR-NRC-12-17

February 17, 2012

Subject: Westinghouse Comments on Draft NRC Report: "Background and Preliminary Assumptions for an Environmental Impact Statement – Long-Term Waste Confidence Update"

Westinghouse appreciates the opportunity to comment upon the subject NRC document. Westinghouse believes that addressing the long-term solution to used nuclear fuel serves the nation in providing safe, reliable nuclear energy as part of a balanced energy mix. The draft report provides a good foundation for further development of the environmental impact statement to support an update to the Waste Confidence Rule.

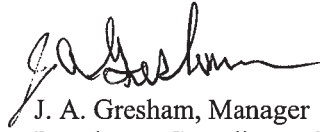
Westinghouse supports the efforts by the NRC to develop a long-term waste confidence rule, which will provide a greater level of acknowledgement to the nuclear industry's commitment to safely and responsibly manage used nuclear fuel into the future. With the continued emphasis on a long-term approach in managing used fuel through extended storage timeframes, it is essential that the Waste Confidence Rule be reflective of that emphasis. During the development of the Environmental Impact Statement (EIS) it will be important to keep under consideration the following points:

- There remains a need for a publicly and politically acceptable waste solution goal that is based on technologies that achieve improvement in fuel cycle economics and decrease the final waste burden on a geologic repository,
- Interim storage methods, either at reactor sites or at separate regional or centralized storage installations must continue to be supported and justified on a scientific basis to ensure the support of state and local constituencies for these facilities,
- The approach to evaluating the environmental impacts of a long term waste confidence rule should be focused on minimizing the impacts on the environment and members of the public to the extent that it provides reasonable assurance of safe operations.

Enclosed is a copy of Westinghouse Electric Company's comments on the draft NRC report: "Background and Preliminary Assumptions for an Environmental Impact Statement – Long-Term Waste Confidence Update"

Correspondence with respect to the enclosed Westinghouse comments should be addressed to J. A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. A. Gresham", with a stylized flourish at the end.

J. A. Gresham, Manager
Regulatory Compliance, Nuclear Services

Enclosures

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Westinghouse Comments on Draft NRC Report: “Background and Preliminary
Assumptions for an Environmental Impact Statement – Long-Term Waste
Confidence Update”

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Westinghouse comments on specific sections of the draft guidance are provided below:

1. Section 7

There appears to be a basic assumption that repackaging of the used fuel will be necessary at some point in the future. This assumption should be removed until such time that it is validated or refuted based on the future work anticipated to be completed as part of the gap analysis that the NRC will soon release. Alternatively, any scenarios that consider repackaging should also evaluate the environmental impact of not repackaging, but rather transportation of any package in its existing form.

2. Section 8.1

Assumption 5: This assumption states that “Long-term storage and handling facilities will operate under a framework of extended aging management that is designed to monitor, detect, and mitigate significant aging impacts.” Westinghouse believes additional clarification would be necessary in the following areas:

1. This assumption should be considered in the context of decommissioned plants where the spent fuel pool is no longer available.
2. Assumption 5 does not align with preliminary Assumption 7, “The EIS will assess the impacts of storing and transporting reprocessing wastes.” There is currently limited experience with storage and transport of reprocessing waste, in that it seems premature to include this analysis with existing waste streams.

3. Section 8.2

General Comment: There should be included one baseline scenario that does not include the assumption that used fuel will be transported to a final geological repository.