

# PUBLIC SUBMISSION

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**Docket:** NRC-2012-0108  
Spent Fuel Transportation Risk Assessment

**Comment On:** NRC-2012-0108-0001  
Spent Fuel Transportation Risk Assessment

**Document:** NRC-2012-0108-DRAFT-0002  
Comment on FR Doc # 2012-11672

5/14/2012  
(1) 77 FR 28406

## Submitter Information

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**Government Agency Type:** State

**Government Agency:** State of Nevada Agency for Nuclear Projects

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## General Comment

See attached file(s)

## Attachments

NRC\_NUREG-2125\_ExtReq

SUNST Review Complete  
Template = ADM-013

E-RIDS = ADM-03  
Add = J. Cook (SRC1)



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June 29, 2012

Chief, Rulemaking Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop: TWB-05-B01 M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**RE: Request for 60-Day Extension to Comment on Draft Report NUREG-2125  
Docket ID NRC-2012-0108**

Dear Sir:

The State of Nevada Agency for Nuclear Projects requests a 60-day extension of the public comment period for Spent Fuel Transportation Risk Assessment, Draft Report for Comment, NUREG-2125, published May 2012. The Federal Register notice published May 14, 2012, announced a 60-day comment period ending July 13, 2012. We received the paper copy and CD in our office on May 23, 2012.

We have been reviewing this document for the past five weeks and request additional time for review and comment for the following reasons:

- The length of the report (almost 500 pages), the scope of the report, and the complexity of the subject matter in and of themselves justify a longer comment period;
- Specific technical issues, such as the selection of shipping cask designs for analysis (and the decision not to include two currently licensed casks, the NAC LWT and the IF-300); assumptions about spent fuel burn up history and cooling time; selection of origin-destination pairs, routes, and buffer distances used for routine dose and accident risk analyses; and consequence analyses for transportation accidents resulting in release of radioactive materials, have required that our agency contract with an outside technical reviewer to assist us in preparing our comments; and

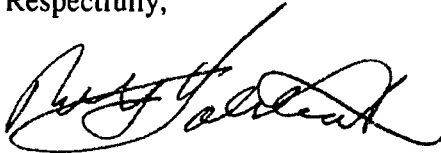
**Request for 60-Day Extension NUREG-2125**

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- The subject report references in its bibliography, but apparently does not actually include in its analyses, a number of recent NRC sponsored studies of transportation accidents involving long-duration, high-temperature fires, requiring additional time to evaluate possible contradictions between those NRC studies and the findings of NUREG-2125.

A comprehensive and objective review of NUREG-2125 is extremely important in relation to current efforts at the Commission to evaluate the risks and impacts of extended spent fuel storage and transportation and current efforts at the U.S. Department of Energy to develop an implementation strategy for the recommendations of the Blue Ribbon Commission on America's Nuclear Future. We ask that you grant our request for additional time to review and comment so that we may more fully consider the assessment of transportation risks in NUREG-2125.

Respectfully,

A handwritten signature in black ink, appearing to read 'Robert J. Halstead', written in a cursive style.

Robert J. Halstead  
Executive Director

cc: Division of Spent Fuel Transportation and Storage, Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission