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**From:** Abigail Johnson [saged183@gmail.com]  
**Sent:** Monday, July 02, 2012 3:38 PM  
**To:** ESTOutreach Resource  
**Subject:** Eureka Co NV Comments  
**Attachments:** Comments on NRC Draft Extended Storage & Transportation Research Needs 063012-signed.pdf

Please find the attached letter on behalf of Eureka County Nevada. Thank you for your consideration.

Abigail Johnson, Nuclear Waste Advisor for Eureka County

**Federal Register Notice:** 99FR99991  
**Comment Number:** 13

**Mail Envelope Properties** (CAHb8bXY1qy8mYUFFSsm-aTmz=2N3fwfdaO=CWiyhbogAkr1DoA)

**Subject:** Eureka Co NV Comments  
**Sent Date:** 7/2/2012 3:37:32 PM  
**Received Date:** 7/2/2012 3:37:34 PM  
**From:** Abigail Johnson

**Created By:** saged183@gmail.com

**Recipients:**  
"ESTOutreach Resource" <ESTOutreach.Resource@nrc.gov>  
Tracking Status: None

**Post Office:** mail.gmail.com

Files	Size	Date & Time
MESSAGE	162	7/2/2012 3:37:34 PM
Comments on NRC Draft Extended Storage & Transportation Research Needs 063012-signed.pdf		
133490		

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

**Eureka County Nuclear Waste Program  
P.O. Box 714  
Eureka, NV 89316**

July 2, 2012

Christian Jacobs, Project Manager  
Mailstop EBB-2B2  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Re: Identification and Prioritization of the Technical Information Needs Affecting Potential Regulation of Extended Storage and Transportation of Spent Nuclear Fuel

Dear Mr. Jacobs:

Eureka County has reviewed the NRC Staff Draft Report for Comment *Identification and Prioritization of the Technical Information Needs Affecting Potential Regulation of Extended Storage and Transportation of Spent Nuclear Fuel*. We offer the following comments on the draft report.

The stated purpose of this report is to identify areas where research needs to be conducted to identify the information needed to accurately assess the risk of long term storage of spent nuclear fuel for both storage and ultimate transportation. The NRC staff selected a three hundred year time frame to assess the risk of long term storage. This very long time frame makes it difficult to accurately project transportation methods and transportation infrastructure that far into the future. Therefore, the NRC staff assumed that there would be no significant changes to the transportation system when the fuel is transported. Although one might argue that this is an unrealistic assumption, for purposes of this report it is an acceptable one. That is because the purpose of the study is to identify the research necessary to accurately characterize the fuel after very long storage. This characterization could then be used by NRC to develop proposed regulations, initially for long term storage and later on for transportation. These regulations would be aimed at maintaining the integrity of the spent nuclear fuel and the storage systems (i.e. casks, canisters, fuel baskets, etc.) to ensure that the fuel is safe to transport. Also, the results of future studies, based upon the research identified in this report, would be used to identify research that would be needed in the future to ensure the safety of transportation for fuel that has been in long term storage. Therefore, this is a reasonable first step in identifying and prioritizing the research that is essential to the identification of future research needs and the development of regulations in the future.

The NRC staff did a credible job of identifying where information is lacking to assess the risk of long term storage. They also did a credible job of ranking the consequences of the degradation of the fuel and storage systems. This allowed the staff to rank the research needs as high, moderate, or low. They then prioritized the research needs based those information gaps that could potentially lead to the highest consequences. Although others might assign different priorities than the NRC staff, the research needs that they prioritized as the highest are significant, and will require substantial research to develop the technology to monitor the spent fuel in storage and then to assess the consequences. The report serves as an adequate foundation for future work.

Sincerely,

*Abigail C. Johnson*

Abigail Johnson  
Nuclear Waste Advisor