

ESTOutreachCEm Resource

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Sent: Monday, July 02, 2012 7:10 PM
To: ESTOutreach Resource
Cc: Marta A. Adams; Jim Williams; Sandy J. Anderson
Subject: Nevada Comments on May 2012 Draft Report for Comment on EST Information Needs
Attachments: L20120702 NRC Chistian Jacobs.pdf

Dear Mr. Jacobs: Please see the attached comments on the May 2012 Draft Report on EST Information Needs. If you require additional information, please contact me at 775.687.3744.

Bob Halstead, Executive Director, State of Nevada, Agency for Nuclear Projects

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July 2, 2012

Christian Jacobs, Project Manager
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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ESTOutreach@nrc.gov (Christian Jacobs)

RE: "Identification and Prioritization of the Technical Information Needs Affecting Potential Regulation of Extended Storage and Transportation of Spent Nuclear Fuel," Draft Report for Comment, May 2012

Dear Mr. Jacobs:

The State of Nevada, Agency for Nuclear Projects supports the comments submitted on this report by the Western Interstate Energy Board's High-Level Radioactive Waste Committee on June 29, 2012. We have several additional comments on 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," published May 2012.

Selection of 300-Year Time Duration for Analysis

We support selection of the 300-year time duration for analysis and believe that NRC staff has appropriately explained that "this does not imply that spent fuel will be stored for 300 years, that the NRC will license storage for 300 years, or that NRC endorses storage for 300 years." [p. 1-2]

We repeat the comment we submitted to NRC regarding assumptions for an Environmental Impact Statement (EIS) on the Long-Term Waste Confidence Update: "there is ample reason to believe that technology development will determine the actual time frame for any spent fuel storage site, whether regional or centralized or even at reactor. One has only to review the technological advances made in the last 100 years to believe that new advances in the next 50-100 years will play a major role in determining the manner in which spent fuel and high-level waste will be managed. Indeed, the history of geologic disposal as a concept is less than 60 years old, dating from the Princeton Conference in 1955 and the resulting publication by the National Academy of Sciences of The Disposal of Radioactive Waste on Land in 1957. The commercialization of dry storage technology is barely 30 years old. The EIS should make the point that, even though the time frame for this EIS is 200 years [when the oldest

fuel will approach 300 years in storage], there are strong reasons to believe that new management solutions will evolve before then, and that any interim storage facility will not likely become a de facto repository.”

Extended Storage and Geologic Disposal

While the focus of this report is on storage and transportation, placement of spent fuel in canisters for extended dry storage also may have significant implications for geologic disposal of spent fuel. In the report, the NRC staff have appropriately acknowledged the importance of coordination between the Extended Storage and Transportation (EST) technical work and development of the Waste Confidence EIS. [p. 1-3] The implications of extended storage for future waste acceptance at a geologic repository, and specifically the acceptance and emplacement of unopened spent fuel canisters as part of a repository waste package, need to be addressed both in the EST technical work and in the Waste Confidence EIS.

Monitoring Dry Storage Systems

The report briefly addresses monitoring of dry storage system components in the Conclusions and summarizes previous gap assessments and the NRC staff evaluation in Appendix A. We agree with the NRC staff focus upon monitoring as a “tool for ensuring continued safety” of spent fuel storage, [p. 5-4] and the observation that monitoring methods that can “detect early signs of degradation before a safety function is severely compromised are of greater value than those that only indicate gross failure.” [p. A9-2]

The Appendix A discussion of methods of inspection and monitoring should be expanded both for canister internal conditions and for dry storage system external structures and support pads. While the report is appropriately focused on information needs for technical safety evaluations, an additional consideration is public acceptance of extended storage at reactor sites and at consolidated storage facilities. To this end, the final report should address in greater detail the availability and reliability of systems for continuous monitoring of canister internal conditions and external structures and consider the potential costs and benefits of combining continuous monitoring, periodic inspections, and nondestructive evaluations.

Thank you for your consideration. We appreciate the opportunity to comment on this report.

Sincerely,



Robert J. Halstead
Executive Director

RH/sja

cc Marta Adams, Chief Deputy Attorney General
Affected Units of Local Government and Tribes
Western Interstate Energy Board HLW Committee