

# PUBLIC SUBMISSION

As of: March 26, 2013  
 Received: March 18, 2013  
 Status: Pending Post  
 Tracking No. 1jx-849w-5sl2  
 Comments Due: March 18, 2013  
 Submission Type: Web

**Docket:** NRC-2013-0004

Retrievability, Cladding Integrity and Safe Handling of Spent Fuel at an Independent Spent Fuel Storage Installation and During Transportation

**Comment On:** NRC-2013-0004-0001

Retrievability, Cladding Integrity and Safe Handling of Spent Fuel at an Independent Spent Fuel Storage Installation and During Transportation

**Document:** NRC-2013-0004-DRAFT-0010

Comment on FR Doc # 2013-00478

1/17/2013  
 78 FR 3853

14

## Submitter Information

**Name:** Michael Callahan

**Address:**

712 North Carolina Ave., S.E.  
 Washington, DC, 20003

**Organization:** Decommissioning Plant Coalition

RECEIVED

2013 MAR 26 AM 9:43

RULES AND DIRECTIVES  
 BRANCH  
 USNPC

## General Comment

See attached file(s)

## Attachments

DPCClad

SUNSI Review Complete  
 Template = ADM - 013  
 E-RIDS = ADM -03

Add= B. White (bhw)

712 North Carolina Avenue, SE  
Washington, DC 20003



Phone: 202.546.4258  
Email: dpc@govstrat.com

March 18, 2013

Ms. Cindy Bladey  
Chief, Rules, Announcements, and Directives Branch (RADB)  
Office of Administration  
Mail Stop: TWB-05-B01M  
U.S. Nuclear Regulatory Commission  
Washington, DC, 20555-0001

RE: Docket ID NRC-2013-0004

Dear Ms. Bladey;

The Decommissioning Plant Coalition (DPC) is pleased to provide some brief comments in response to the US Nuclear Regulatory Commission's request on potential rulemaking on the topic of retrievability, cladding integrity, and the safe handling of spent fuel at an Independent Spent Fuel Storage Installation (ISFSI). We note that the Nuclear Energy Institute is providing detailed comments and we are in agreement with the overwhelming majority of them. A number of our members will also provide specific comments. We wish to emphasize several points.

First, this effort can be enhanced by defining specific periods for storage and removal. This effort's scenarios and questions are "open-ended," and as such do little to promote the long-held tenet of the Commission that it does not endorse indefinite on-site storage of spent fuel and Greater Than Class C Waste. The time period for which data is desired will also help clarify the benefits and methods of obtaining the data.

Second, the staff should recognize the responsibility of the federal government. It has, currently through DOE, the obligation to take and remove the spent fuel and Greater Than Class C Waste stored in existing canister systems at our members'

sites under the Nuclear Waste Policy Act and the associated standard contract. We also believe it is the obligation of the federal government for any repackaging that needs to take place.

The DPC will remain involved in your effort as you go forward and we believe it offers the opportunity to improve the regulatory framework as outlined in comments you receive from the NEI and licensees.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Callahan".

Michael S. Callahan  
Governmental Strategies Inc  
(on behalf of the Decommissioning Plant Coalition)