

CHAIRMAN Resource

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Sent: Thursday, December 12, 2013 6:05 PM
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Subject: High Burnup Dry Storage Cask Research and Development Project

To Department of Energy, C/O Melissa Bates

Please extend today's 12/12/2013 deadline for comments to the High Burnup Dry Storage Cask Research and Development Project Draft Test Plan for at least 30 days. Many in our communities have only recently become aware of this document and the serious problems with high burnup nuclear fuel waste. We need more time to review and comment.

Both San Onofre and Diablo Canyon nuclear power plants have large inventories of high burnup nuclear fuel.

The fact that the NRC will not approve transportation casks for high burnup fuel due to the risk of protective cladding failure is of critical concern. NRC and DOE data and nuclear experts, such as Dr. Marvin Resnikoff, have stated the high burnup fuel can cause the protective Zirconium cladding to become fragile. This puts the cladding at risk for shattering and releasing radiation into the environment.

<http://www.nrc.gov/reading-rm/doc-collections/isg/isg-11R3.pdf>

In addition, the NRC's Dr. Robert E. Einziger in March 2013 stated there is insufficient data to support extending high burnup dry cask storage for more than 20 years. This gives us even greater concern regarding storing tons of high burnup used fuel near our California coastline.

The fact that current data shows high burnup used nuclear fuel can cause embrittlement of the protective cladding, resulting in possible shattering, which can lead to release of radiation into the environment means we need an expedited R&D solution and one that does not put industry profits ahead of our safety.

The fact that this project requires the invention of technology in order to monitor inside dry casks raises another concern regarding the timeline of this project.

<http://www.forbes.com/sites/jeffmcmahon/2013/05/02/fancy-new-lids-for-nuclear-waste-casks-as-contents-get-hotter/?view=pc>

High burnup fuel has already been stored for up to 10 years in dry casks in the U.S., according to nuclear industry data. This leaves little time to develop a solution to this critical problem.

<http://sanonofresafety.files.wordpress.com/2013/06/nei-highburnupslide2012-07-25.pdf>

Initially, the NRC approved high burnup fuel with the assumption that it would react similar to lower burnup fuel in storage -- it just needed to cool longer in the spent fuel pools (up to 20+ years). The NRC and DOE now knows this is not true. However, many nuclear experts, including some at the NRC, are still not aware of this. Elected officials and government regulators also uninformed on this issue. We need time to inform them and the public on this critical issue.

See sources for the above facts and other important information on high burnup fuel at:

<http://sanonofresafety.org/nuclear-waste/>

Also, please add me to any distribution list you have on this issue, so I can be informed of updates.

<http://www.id.energy.gov/insideNEID/PDF/DOE%20HBU%20Demo%20-%20Draft%20Test%20Plan%20Report%20-%20Final.pdf>

<http://www.id.energy.gov/insideNEID/PublicInvolvement.htm>

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