

## **Rulemaking1CEm Resource**

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**From:** RulemakingComments Resource  
**Sent:** Thursday, December 26, 2013 2:59 PM  
**To:** Rulemaking1CEm Resource  
**Cc:** RulemakingComments Resource  
**Subject:** PR-51 Waste Confidence  
**Attachments:** 1206 duke.pdf

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**FRN#:** 78FR56775  
**NRC DOCKET#:** NRC-2012-0246  
**SECY DOCKET DATE:** 12/20/13  
**TITLE:** Waste Confidence—Continued Storage of Spent Nuclear Fuel  
**COMMENT#:** 00738

**Hearing Identifier:** Secy\_RuleMaking\_comments\_Public  
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"RulemakingComments Resource" <RulemakingComments.Resource@nrc.gov>

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"Rulemaking1CEM Resource" <Rulemaking1CEM.Resource@nrc.gov>

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# PUBLIC SUBMISSION

<b>As of:</b> December 20, 2013 <b>Received:</b> December 20, 2013 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1jx-89ei-geel <b>Comments Due:</b> December 20, 2013 <b>Submission Type:</b> Web
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**Docket:** NRC-2012-0246

Consideration of Environmental Impacts on Temporary Storage of Spent Fuel After Cessation of Reactor Operation

**Comment On:** NRC-2012-0246-0456

Waste Confidence - Continued Storage of Spent Nuclear Fuel; Extension of Comment Period

**Document:** NRC-2012-0246-DRAFT-1206

Comment on FR Doc # 2013-26726

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## Submitter Information

**Name:** Paul Duke

**Address:**

PO Box 236

Hancocks Bridge, NJ, 08038

**Email:** paul.duke@pseg.com

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## General Comment

See attached file(s)

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## Attachments

LR-N13-0296\_NRC



LR-N13-0296  
December 20, 2013

Secretary, U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Rulemakings and Adjudications Staff

Subject: Response to Request for Comments - Waste Confidence-Continued Storage of  
Spent Nuclear Fuel (78FR56776, dated September 13, 2013, Docket ID NRC-  
2012-0246)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments published in the Federal Register on September 13, 2013 (78FR56776) concerning the NRC's proposed revision to the generic determination on the environmental impacts of the continued storage of spent nuclear fuel beyond a reactor's licensed life for operation and prior to ultimate disposal.

PSEG Nuclear LLC (PSEG) appreciates the opportunity to comment on this subject and offers the attached comment for consideration by the NRC.

If you have any questions or require additional information, please contact Mr. Brendan Daly at 856-339-7903.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul R. Duke, Jr.", written over a horizontal line.

Paul R. Duke, Jr.  
Manager - Licensing

Attachment

Response to Request for Comments  
Waste Confidence-Continued Storage of Spent Nuclear Fuel

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments published in the Federal Register on September 13, 2013 (78FR56776) concerning the NRC's proposed revision to the generic determination on the environmental impacts of the continued storage of spent nuclear fuel beyond a reactor's licensed life for operation and prior to ultimate disposal.

Appendix E to Draft NUREG-2157, "Waste Confidence Generic Environmental Impact Statement" (DGEIS), describes the environmental impacts of spent fuel pool leaks that may occur during the short-term storage timeframe. Section E.3 reviews the history of spent fuel pool leaks at commercial nuclear power plants.

Table E-4, "Occurrence of Spent Fuel Pool Leakage at U.S. Nuclear Power Plants." lists sites at which spent fuel pool leakage has occurred based on data and information available to the NRC. Salem Unit 2 is incorrectly listed as having released radioactive liquid to the environment from spent fuel pool leakage.

As noted in NUREG/CR-7111, "A Summary of Aging Effects and Their Management in Reactor Spent Fuel Pools, Refueling Cavities, Tori, and Safety-Related Concrete Structures," in 2010, evidence of a small leak was noted to be present in the Unit 2 telltale drain system.

The Unit 2 spent fuel pool leakage is properly characterized as contained within spent fuel pool leakage-collection system. DGEIS Table E-4 should be revised accordingly.