

From: [Bart Ziegler](#)
To: [MacDougall, Robert](#); [CHAIRMAN Resource](#)
Cc: ["Donna Gilmore"](#); [Casey Collins, Assistant Director](#)
Subject: Docket ID NRC-2014-0275 - Robert D. MacDougall Office of Nuclear Material Safety and Safeguards
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Robert D. MacDougall
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

April 22, 2015

RE: Docket ID NRC-2014-0275

Dear Robert,

As I hope you are already aware, The Samuel Lawrence Foundation has been very engaged in the issue of nuclear energy safety for numerous years. We were instrumental in closing San Onofre and are very concerned about how nuclear waste from this site and all sites in the U.S. are currently being handled and will be dealt with long term. We have been actively engaged with researchers in the United States and around the world regarding this issue and hope that you will ensure that the commission makes the best decision for the current and future health and safety of the citizens of our country and the world.

We are writing to you now hoping to ensure the U.S. Nuclear Regulatory Commission will deny the use of Holtec thin spent fuel canisters for the storage and transfer of nuclear waste. Based on research Donna Gilmore, www.sanonofresafety.org, has already submitted to the commission, we strongly support the position that these containers do not provide sufficient protection for nuclear waste material and are simply unacceptable.

The U.S. should be a market leader in nuclear waste safety. These containers are being considered for San Onofre which is in close proximity of densely populated areas, near large earthquake faults and where there is discussion of waste material being stored indefinitely. We would hope that you and your commission would do everything in your power to minimize the risk to the fullest extent possible to avoid a Fukushima type event from happening.

For this reason, we believe you should support the use of thick nuclear waste dry storage casks as they are a far superior choice for short and long term storage. The thick casks do not have cracking issues and allow for redundancy and repair. Thick casks have pressure monitoring in the lid that provide early warning of potential helium leaks and continuous

remote radiation monitoring. They meet ASME standards, have ASME certification and international quality certifications.

In addition to the advantages of the thick nuclear waste dry storage casks, there is already evidence to support that the Holtec thin spent fuel canisters are potentially already cracking and failing. At Diablo Canyon similar Holtec MPC thin canister have already shown conditions for chloride induced stress corrosion cracking that have only been loaded with fuel for two years. There is also a question of whether or not they have been fully tested to handle the seismic conditions found in the U.S. - which as stated earlier is of particular concern in California.

We hope that we can count on you and the U.S. Nuclear Regulatory Commission to make the best decisions for the citizens of our country. I look forward to hearing from you and seeing the results of the commission's work soon.

Regards,

Bart Ziegler PhD, Co-founder/President

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CC: Chairman@nrc.gov