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Seismic Stability Analysis for Spent Fuel Dry Cask Stack-up Configuration

Comment On: NRC-2015-0098-0001

Seismic Stability Analysis for Spent Fuel Dry Cask Stack-Up Configuration; Draft Regulatory Issue Summary for Comment

Document: NRC-2015-0098-DRAFT-0004

Comment on FR Doc # 2015-08958

4/20/2015

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Submitter Information

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General Comment

Seismic Stability Analysis for Spent Fuel Dry Cask Stack-Up Configuration; Draft Regulatory Issue Summary for Comment NRC-2015-0098

You need to explain how long they are left in stack up and why. They should be immediately moved into the proper position.

You say that it's "to determine if a spent fuel dry cask loading stack-up configuration needs to be laterally supported" but the only discussion of lateral is "for base support surfaces that provide no restraint to lateral sliding, the maximum permissible lateral migration of the stack-up configurations base..." Furthermore, as usual, you violate the clear writing rule.

You need to reinstate requirements for lateral supports at all times, as described below. In 2010 the NRC said: For the inspection of a freestanding (unrestrained) stack-up configuration, the inspectors shall request the general licensee to provide the documentation approving the unrestrained stack-up configuration used to perform vertical transfer operations and the associated NRC staff SER.

In the absence of such documentation vertical transfer operations shall be postponed until either documentation approving such operations can be provided or a system of lateral restraints has been installed.

When a lateral restraint system has been provided, the inspectors should review the seismic analysis calculations to ensure the structural adequacy of the lateral restraint design (p.5) Response to Region III Technical Assistance Request for First Energy Operating Company Perry

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ERL ID = AD11-03
 Del = P. Keene (STKs)

SUNSI Review Complete
 Resubmitted = AD11-013

Nuclear Power Plant, Unit 1, Evaluation of Freestanding Stack-up Configuration (ML103010389), Dated 10-29-2010 NRC Memorandum from Vonna Ordaz to Anne Boland, DSST Ticket No. 201100002, ML110200478, February 25, 2011. cited in:
<http://pbadupws.nrc.gov/docs/ML1111/ML111160566.pdf>

So, why are you trying to do away with yet another needed safety measure?

You need to elaborate other ways they may tumble.

According to NUREG 1864, if the inner casks are dropped on transfer there is a 28% chance they will leak. If they leak those nearby will be exposed to at least 1850 mSv, according to both NUREG 1864 and NUREG 2157, which is 1850 times the yearly dose of 1 mSv.

For women nearby the risk of cancer or leukemia, at this dose, is as high as 52%, according to the National Academy of Sciences BEIR report. For children the risks are higher still. For unborn children serious cancer risk starts at 10 mSv. This is 185 x greater. On average the risk of cancer or leukemia to the nearby population is 18.5% and that is if the exposure is not an underestimate and you know it is because that's what you are expert in - underestimating and ignoring risks to save utilities money.

While you will say that it's beyond the scope of the comment period, the proper orientation for dry casks is on the side in brackets and monitored at all times.

Bravo that you finally admit in the title "Regulatory" what you are. You are indeed the Regulatory Commission: "A tort, in common law jurisdictions, is a civil wrong that unfairly causes someone else to suffer loss or harm resulting in legal liability for the person who commits the tortious act, called a tortfeasor." <http://en.wikipedia.org/wiki/Tort>
Note the last - it results in legal liability. That means you! Following the leader wasn't an excuse when Nazis were brought to trial for murdering people.