

# PUBLIC SUBMISSION

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Draft Clearance Package for OMB 3150-0199, 10 CFR Part 63, Disposal of High-Level Radioactive Wastes in a Geologic Repository at Yucca Mountain, Nevada

**Comment On:** NRC-2016-0264-0001

Information Collection: Disposal of High-Level Radioactive Wastes in a Geologic Repository at Yucca Mountain, Nevada; Request for Comment on Renewal of Existing Information Collection

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## Submitter Information

**Name:** John Layman

**Address:**

938 Troon Street NW  
Albany, OR, 97321

**Email:** jlayman800@hotmail.com

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## General Comment

As an experienced, degreed engineer with many years in the nuclear industry, I urge the NRC to abandon the Yucca Mountain concept. This concept was the product of a political climate of fear of used nuclear fuel which was misplaced.

I offer regional, near-surface, monitored retrievable storage (MRS) as a better alternative. The MRS has the following advantages:

Lower cost

Allows easy retrieval

Safe storage of reduced regional quantities

Keeps fuel in the region it was generated rather than long distance shipping (reduced risks during transportation)

No need for projecting geologic behavior for thousands of years

Greater security than storage at reactor sites

It is my belief that spent fuel will become a valuable resource in the not too distant future. We have spent millions to mine and refine this material. Very little is consumed in the time it is in the reactor. Recovery for other purposes or reprocessing for nuclear plants will become more economical as technology and political climate improve.

The Nuclear Waste Policy Act (1982) authorized the Department of Energy to remove spent fuel from commercial reactor sites and to develop a Monitored Retrievable Storage (MRS) site where the waste would be stored prior to disposal. This is by no means a new idea. I'm convinced, with the right management and regulatory controls, the MRS could be a long-term answer to safe storage of spent nuclear fuel.

<https://energy.gov/downloads/monitored-retrievable-storage-background>

<https://curie.ornl.gov/SED/pages/monitored-retrievable-storage-mrs>

