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Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities

Comment On: NRC-2017-0211-0001

Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities; Request for Comment on Draft NUREG

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General Comment

I am a 19 year resident of San Clemente. My family and I are deeply concerned about the safety of issues surrounding the storage of nuclear waste in such close proximity to our home. I have infant grand children that spend many many hours every week at my home. Their life and their future are of utmost importance to me as well as the lives and future of all people who will be impacted by any problems arising from the storage of nuclear waste so near to our community.

The NRC cannot meet its mission to "ensure adequate protection of public health and safety and the environment" if it continues to allow thin-wall welded canisters that the NRC has admitted are vulnerable to cracks, that cannot be fully inspected (inside or out), and cannot be repaired, maintained and monitored to prevent (not just detect) radiological leaks.

There is no adequate or proven detailed plan required to address major radiological leaks, or to address on-site replacement of containers. Seismic requirements for partial cracks is not addressed. See below webpage for details on the Holtec UMAX System planned for San Onofre and why this is an example of a system with major problems that should not be approved.

<https://sanonofresafety.org/holtec-hi-storm-umax-nuclear-waste-dry-storage-system/>

Each canister contains about as much or more lethal Cesium-137 as released from the 1986 Chernobyl nuclear disaster, yet the NRC knows the boron metal in the canisters will not prevent the fuel from going critical if exposed to non-borated water from through wall cracks (in storage or transport). NUREG-2215 states it requires "conservative assumptions", "inspections", and admits to many "unknowns". NUREG-2215 is not "conservative", does not require adequate "inspections", and does not resolve the many "unknowns" that would be eliminated if the NRC mandated and enforced critical safety requirements to inspect, monitor, maintain and repair (both inside and out) to PREVENT leaks.

Proven dry storage technology exists that meets critical basic safety requirements we expect in a car.