

# PUBLIC SUBMISSION

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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

**Document:** NRC-2017-0211-DRAFT-0067

Comment on FR Doc # 2017-24734

SUNSI Review Complete  
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 Add= *Jeremy Smith (JAS)*

## Submitter Information

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*(60)*  
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## General Comment

I completely agree with the following statement submitted by Donna Gilmore:

Comments to NRC Docket ID NRC-2017-0211, NUREG-2215

NRC Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities Draft, November 2017

<https://www.nrc.gov/docs/ML1731/ML17310A693.pdf>

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 they admit 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.

Does the NRC consider thin-wall canisters "conservative assumptions" compared to thick-  
 wall casks? If  
 so, why? Why does the NRC allow containers that do not meet these basic critical safety  
 requirements?