

Gallagher, Carol

From: myla reson <myla.reson@gmail.com>
Sent: Tuesday, January 02, 2018 6:51 PM
To: Gallagher, Carol
Cc: Ted Lieu; Ben Allen; Henry Stern
Subject: [External_Sender] Docket ID NRC-2017-0211

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 U.S. Nuclear Regulatory Commission puts all of southern California at grave and unnecessary risk by not providing for the most robust, monitored, retrievable storage for the legacy of high level radioactive waste created at San Onofre.

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?

Respectfully,

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"A common denominator, in every single nuclear accident -- a nuclear plant or on a nuclear submarine -- is that before the specialists even know what has happened, they rush to the media saying, 'There's no danger to the public.' They do this before they themselves know what has happened because they are terrified that the public might react violently, either by panic or by revolt." ~ Jacques Cousteau, 1989