

**Blount, Barbara**

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**Subject:**

FW: Docket ID NRC-2017-0211

Sirs & mesdames:

Tin cans are no way to store nuclear waste. A much more appropriate thick walled canister as used by other countries using nuclear plant energy is much more appropriate. I endorse the document attached from [SanOnofreSafety.org](http://SanOnofreSafety.org).

This material is thoroughly researched. Following its recommendations should replace your present guidelines before half of California becomes an evacuation zone due to a Fukushima-like event resulting from the deadly combination of earthquake and/tsunami.

Date: January 2, 2018

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 throu

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Add= Jeremy Smith (JUS5)

gh 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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### Basic Safety Requirements

Thin-wall canisters

Thick-wall casks

Thick walls

No

Gamma & neutron protection

Requires vented concrete overpack

Yes

Transportable

No transport with cracks.

10 CFR §

71.85

Yes

Proven technology

No. Conditions unknown. Most in use less than 15 yrs, a few 30 yrs.

Yes. Inspected and used over 40 years

Author of Three Tides: Writing at the Edge of Being available from [Wingspress.com](http://Wingspress.com) "Writers, readers, teachers, and creative writing classes, take note: Cecile Pineda is an American original, a literary treasure.... Her prodigiously inventive and important work... deserves a place in the forefront of American literature." -- Jeff Biggers, in Bloomsbury Review

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