

Blount, Barbara

From: Gallagher, Carol
Sent: Monday, January 22, 2018 2:05 PM
To: Blount, Barbara
Subject: FW: Surfrider Foundation Comments on Docket ID NRC-2017-0211
Attachments: SurfriderFoundation_NRC-2017-0211_Comment_Jan5.pdf

From: Katie Day [mailto:kday@surfrider.org]
Sent: Friday, January 05, 2018 3:06 PM
To: Gallagher, Carol <Carol.Gallagher@nrc.gov>
Subject: [External_Sender] Surfrider Foundation Comments on Docket ID NRC-2017-0211

Dear Carol Gallagher,

Thank you for your consideration of Surfrider Foundation's attached comments regarding Docket ID NRC-2017-0211.

Sincerely,
Katie Day

Katie Day | Staff Scientist | [Surfrider Foundation](#)
340.514.2803 | kday@surfrider.org

(160) 82 FR 52944
11/15/2017

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM -03
Add= Jeremy Smith (Jass)



Carol Gallagher
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Comments on Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities, NRC-2017-0211

January 5, 2018

Dear Carol Gallagher,

The Surfrider Foundation (Surfrider) appreciates this opportunity to provide comments to the Nuclear Regulatory Commission (NRC) regarding safety assurances specified in the Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities.

Surfrider is a nonprofit environmental organization that engages a vast volunteer network of ocean users to protect the ocean, waves and beaches through conservation, activism, research, and education. We represent ocean recreation users from surfing to seabird watching and beach going, as well as the coastal communities and economies that rely on them nationwide. In addition to general enjoyment and health benefits, the coastal recreation and tourism sector directly contribute over \$107 billion in national Gross Domestic Product and provide over 2.2 million jobs annually.¹ These recreation opportunities and economic contributions depend significantly on the preservation and protection of coastal and ocean ecosystems. These recreation areas and coastal communities could be at severe risk of deadly radiation exposure if coastal Independent Spent Fuel Storage Installations (ISFSI's) do not adequately and safely store spent nuclear fuel.

Surfrider has a large constituency of coastal community members in Southern California who are deeply concerned about the planned ISFSI at the San Onofre Nuclear Generating Station (SONGS). We strongly request that the NRC ensure that thorough and redundant safety precautions are taken to protect these coastal communities from exposure to spent nuclear fuel. This area borders a fault line, is on a receding cliff subject to sea level rise, and is in a tsunami hazard area. The power plant is also in close proximity to one of the nation's busiest transportation corridors (Interstate-5) and the major urban areas of San Diego and Los Angeles.

As such, we request that the Standard Review Plan ensure dry storage facilities use casks or canisters which can be monitored for temperature and radiation changes, inspected for cracks and leaks, and repaired onsite if pitting or cracking starts to occur. We are also concerned about the risk of chloride induced stress corrosion cracking (CISCC) of austenitic metal (such as 316L steel) in salty environments. Proposed ISFSI's using austenitic metals near marine and coastal environments would be more secure if

¹ National Ocean Economics Program. "Ocean Economy Tourism and Recreation 2014". *Middlebury Institute of International Studies at Monterey Center for the Blue Economy*.

they were physically blocked from salt exposure, preventing the ability of salt from deliquescing directly on the metal and subsequent CISCC. Requiring the use of an indoor storage facility would help protect the structural integrity of steel storage canisters. This physical barrier from salt exposure would also help ensure that loaded canisters remain transportable when the Department of Energy and NRC approve either an offsite consolidated interim storage facility or permanent storage facility in a more stable environment.

We also request that Maintenance and Inspection Plans be drafted and approved prior to the loading of spent fuel. This will ensure that plant operators are already equipped with the necessary technology and trained to monitor, inspect, and repair canisters before issues arise. The management and storage of severely dangerous high-level radioactive waste is extremely complex, and we appreciate your efforts to protect the nation's inhabitants from radiation exposure. As climate change intensifies on our coastlines, bringing storms of unprecedented strength and frequency, we can no longer rely on historical norms to predict future hazards. We must employ the precautionary principle. With such high risks to human health, please consider the inclusion of the above requests in the Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities, to provide greater assurance to and protection of communities that border ISFSI's.

Thank you for your consideration of Surfrider's comments regarding the necessity of adequate safety precautions to protect coastal communities and environments from radiation exposure during the storage of spent nuclear fuel. We submit these comments on behalf of Surfrider Foundation's 80 chapters, 70 clubs, and 500,000 members and supporters in the United States.

Sincerely,

A handwritten signature in black ink that reads "Katie Day". The signature is fluid and cursive, with the first name "Katie" and last name "Day" clearly distinguishable.

Katie Day
Staff Scientist
Surfrider Foundation



Carol Gallagher
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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Katie Day
Staff Scientist
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