

SUNSI Review Complete
 Template = ADM-013
 E-RIDS=ADM-03
 ADD: Jill Caverly

As of: 5/1/20 7:48 AM
Received: April 30, 2020
Status: Pending_Post
Tracking No. 1k4-9gfc-u8v1
Comments Due: July 22, 2020
Submission Type: Web

PUBLIC SUBMISSION

COMMENT (35)
 PUBLICATION DATE:
 3/20/2020
 CITATION 85 FR 16150

Docket: NRC-2018-0052

Holtec International HI-STORE Consolidated Interim Storage Facility Project

Comment On: NRC-2018-0052-0300

Holtec International HI-STORE Consolidated Interim Storage Facility Project

Document: NRC-2018-0052-DRAFT-0343

Comment on FR Doc # 2020-05690

Submitter Information

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General Comment

NRC's time-limited focus on just 40 years of "temporary storage" is inappropriately short, given Holtec's own admission in its license application to NRC that "interim storage" could persist for 120 years; in response to a Request for Information from DOE, Holtec admitted a CISF could operate for 300 years; and in NRC's own 2014 Continued Storage of Spent Nuclear Fuel Rule and Generic EIS, the agency acknowledged away-from-reactor ISFSIs (Independent Spent Fuel Storage Installations) could go on indefinitely (that is, forevermore). Institutional control could be lost over such long time periods. Failed containers could release catastrophic amounts of hazardous radioactivity directly into the surface environment, to blow downwind, flow downstream, bioconcentrate up the food chain, and harm people down the generations. Please consider the danger to humanity if you allow this project to continue.