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Subject: Spent Fuel

Paul:

Fuel consolidation poses an incredible large and significant unreviewed safety question. The NRC issued NUREG-1353 in the mid 1980's that reported the results from postulated spent fuel pool accidents. The consequences were staggering, even though the NRC non-conservatively assumed that only 1/3 of a reactor core inventory would be damaged in a spent fuel pool accident.

If the postulated accident is re-analyzed using the actual spent fuel pool inventory of considerably more than one reactor core, the consequences will increase (less than linearly due to decay, but still increase).

NUREG-1353 also DID NOT CONSIDER CONSOLIDATED SPENT FUEL STORAGE. It assumed that even if water level dropped or fuel pool cooling was lost, the 'older' spent fuel would be adequately cooled through available heat transfer mechanisms (convection and natural circulation). Spent fuel consolidation blows that assumption out of the water (so to speak). To the best of my knowledge, these issues have not been addressed.

Just because we haven't yet established a repository for spent fuel should not be justification for filling the spent fuel pools solid.

It absolutely astounds me that we close our eyes to risk once the fuel is out of the reactor vessel. I hope we don't pay for being dumb (because the price tag for being this stupid is too high).

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