

## RulemakingComments Resource

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**From:** Donna Gilmore <dgilmore@cox.net>  
**Sent:** Wednesday, October 08, 2014 10:05 PM  
**To:** RulemakingComments Resource  
**Cc:** Gary Headrick; Gene Stone; CHAIRMAN Resource; Woollen, Mary  
**Subject:** Docket ID NRC-2014-0120 Holtec International HI-STORM Underground Maximum Capacity Canister Storage System, CoC No. 1040  
**Attachments:** 8-5-14 SCC RIRP NRC presentation.pdf; DryCaskStorageIssues2014-09-23.pdf; DocketNRC-2014-0120Gilmore.pdf

Given the recent NRC continued storage and GEIS decisions, shouldn't requirements for extended storage be included in any new NRC CoC approvals? Shouldn't this CoC approval be put on hold until that happens? This Holtec certification is only for 20 years. No aging management requirements are included to reflect the new NRC decision for extended storage. The NRC does not plan to finalize aging management revisions to NUREG-1927, NRC Standard Review Plan for Renewal of Spent Fuel Dry Cask Storage System Licenses and Certificates of Compliance, until 2015, according to Mark Lombard, Director of the Division of Spent Fuel Management. This UMAX CoC approval should be put on hold until after the revised NUREG-1927 is final and any appropriate aging management issues are addressed in this CoC.

The NRC 8/5/2014 presentation on Chloride-Induced Stress Corrosion Cracking Tests and Example Aging Management Program, states up to a 75% crack will be allowed. However, there does not appear to be a seismic evaluation for cracked canisters in this Holtec system. See slide 20: Canisters with localized corrosion and/or SCC must be evaluated for continued service in accordance with ASME B&PV Code Section XI IWB-3514.1 and IWB-3640.

Approving these canisters for coastal environments may result in stress corrosion cracks with no current method to inspect or repair them. This issue needs to be addressed in NUREG-1927 or some other NRC document before approving this CoC. What is the defense-in-depth? With unsealed canned damaged fuel, there does not appear to be defense in depth. With extended storage of high burnup fuel, what is the defense-in-depth, given the unknowns of extended storage with high burnup fuel?

The U.S. steel/concrete systems have been used since 1993, starting with Calvert Cliffs. The Calvert Cliffs dry storage license has not been renewed by the NRC due to aging management concerns. Prairie Island's dry storage license has also not been renewed. Both licenses are expired. The NRC currently only certifies dry cask systems that store high burnup fuel for an initial 20 years. Before renewing these and other licenses, the NRC stated in the August 5, 2014 presentation that it plans to require an aging management plan, due to numerous unresolved aging issues with extended storage. What reason is this being approved now? Wouldn't it be prudent to wait until the aging management issues are addressed?

The UMAX below ground system raises additional issues about how the Holtec's 1/2" thick stainless steel MPC (canister) can be inspected. This has not been addressed in this CoC. And if a canister needs to be replaced, a spent fuel pool or some other specific system needs to be identified in the documentation. Now that canisters and cask will be on-site indefinitely, these issues should be addressed in any new CoC approvals, including this one.

Southern California Edison is considering using this UMAX system. However, many California residents are more concerned with having a system with a proper aging management plan in place than rushing this approval, considering the current indefinite storage plan of tons of San Onofre waste in our communities.

See additional references at these links and attached, including a .pdf of this email.

San Onofre Dry Cask Storage Issues, September 23, 2014, D. Gilmore, SanOnofreSafety.org  
<https://sanonofresafety.files.wordpress.com/2011/11/drycaskstorageissues2014-09-23.pdf>

Chloride-Induced Stress Corrosion Cracking Tests and Example Aging Management Program, August 5, 2014, Darrell Dunn, NRC <https://sanonofresafety.files.wordpress.com/2013/06/8-5-14-scc-rirp-nrc-presentation.pdf>

List of Approved Spent Fuel Storage Casks: Holtec International HI-STORM Underground Maximum Capacity Canister Storage System, Certificate of Compliance No. 1040  
<http://www.regulations.gov/#!documentDetail;D=NRC-2014-0120-0002>

Thank you for your consideration. The future of California may be in your hands.

Donna Gilmore  
SanOnofreSafety.org  
San Clemente, CA  
dgilmore at cox.net

Gene Stone  
Residents Organized for a Safe Environment Member, Edison Community Engagement Panel San Clemente, CA

Gary Headrick  
San Clemente Green  
San Clemente, CA