

**Comments Submitted Online by Virtual Attendees During the U.S. Nuclear Waste
Technical Review Board’s August 30, 2023, Summer 2023 Meeting in the Order that the
Comments Were Submitted¹**

Name: Dan Leone
Affiliation: Exchange Monitor Publications
Comment: Thanks for making this available online.

Name: Jan Boudart
Affiliation: Michigan Safe Energy Futures
Comment: Thanks for this meeting.

Name: Rich Janati
Affiliation:
Comment: Has DOE considered seeking input from the states that implemented a volunteer siting process for the development of a low-level radioactive waste disposal facility and incorporate lessons learned into the DOE Consent-Based Siting effort? I don't mean seeking comments in the development of the plan but through direct contact or face-to-face meetings.

Name: Kalene Walker
Affiliation: none
Comment: question: When will technical experts, including material engineers specializing in canister and fuel degradation mechanisms be presenting. As the NWTRB Aug 2023 letter to Kathryn Huff acknowledges:
“Finding 4: The Board finds that there may be some technical difficulties with meeting the 10 CFR Part 72 requirements for SNF storage following the transportation of SNF, governed by 10 CFR Part 71. For example, 10 CFR Part 72 requires the licensee to demonstrate that the SNF cladding can meet its intended confinement function before placing the SNF into dry storage; but it is unclear how the licensee will demonstrate adherence to this requirement for SNF inside a welded canister.”

I’ll add that this is an issue to be addressed BEFORE transport as well.

¹ These include only the technical comments and not those comments identifying issues with the audio or video of the web stream. The Board appreciates the virtual attendees letting us know when audio-visual arise and are when the issues are resolved.

Name: Don Hancock

Affiliation: Southwest Research and Information Center

Comment: It is at best misleading to say that specific states are "engaged" in the consortia since there was no requirement in the FOA to demonstrate any state official engagement in the application or the two-year process.

A learning from the Negotiator process was supposedly that if the communities and state(s) are not in sync that there is no positive result. It appears that learning is not being applied in the consortia process.

Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: If you're serious about public disclosure, make all those over 10,000 public comments public.

Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: The DOE CIS group needs to reevaluate their false perception the nuclear waste is safely stored.

Name: Kalene Walker

Affiliation: none

Comment: It did not escape the public that DOE granted Holtec \$2m to be part of consortium to engage with the public.... Holtec, who has numerous ISFSI sites and is proposing a CIS.

brazen at best.

Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: The statement from the DOE CIS Group that there is no current definition of what entity the consent needs to come from is very concerning. Have they read the U.S Constitution? This federal overreach needs to stop now. If anything, each state should have more authority over nuclear waste within their state. This isn't Russia or China. It's clear it's time for new leadership at the federal level.

Name: Kalene Walker

Affiliation: none

Comment: "Trust" is based on truth and facts.

DOE's record of contaminated sites, off-site radiation contamination and harm to communities is voluminous.

Perhaps the different categories of 'Justice' being discussed today could acknowledge the record.

Name: Heather Westra

Affiliation: Prairie Island Indian Community

Comment: It is important to note that not all communities participating the CBS consortia are doing so to learn more. Some, like the Prairie Island Indian Community (a de facto host community), are doing so to INFORM the siting process.

How will the DOE develop its Tribal Engagement and Consultation Strategy? Are you planning to meet with the tribes and have the tribe help develop the strategy? Or will this be developed in a vacuum and then sent out for review and comment?

Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: The Environmental Justice speaker referenced monitored retrievable storage. It appears she and other are not aware the thin-wall canisters they are proposing to transport and store do not have monitored or retrievable fuel storage as required by the Nuclear Waste Policy Act, ASME N3 codes and NRC regulations (that the NRC gives exemptions to in order to please the nuclear industry).

Name: Dan Solitz

Affiliation:

Comment: It strikes as somewhat disingenuous to not discuss facilities for aging fuel management as the oldest cast spent fuel date back to the 1990's And by the time an "interim site comes on line the oldest cask will be long in the tooth and will need some care

Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: Are digital system options considering repackaging fuel assemblies into thick-wall metal casks that meet NWPA, ASME N3 and NRC requirements for storage and transport? Existing thin-wall canister systems do not meet those requirements? If not, why not?

Name: Tony Leshinskie

Affiliation: Vermont Public Service Department

Comment: I can certainly concur that START was fairly intuitive to learn, since it only has about a dozen or so basic case inputs. The available layers from a case run provide a lot of additional information. While these provide versatility, they may require some training such that their potential results are not misinterpreted.

That being said, since I've worked with START for several years now, I'm willing to be a guinea pig for NGSAM. Besides my START experience, I used to work as a reactor systems simulation analyst (mostly CESEC-III and CENTS codes, but I was also a core simulation and Thermal-

Hydraulics code user) at Combustion Engineering and later Westinghouse. I'm sure this experience would be useful in developing NGSAM.

Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: Suggest the DOE and NWTRB compare Swiss Interim Storage and transport to the current U.S. nuclear waste storage. The below link has details and reference links on both. It's unfortunate that the Swiss speaker did not cover this.

<https://sanonofresafety.org/swiss/>

Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: Is the DOE aware that all thin-wall Holtec canister systems gouge or scrape the walls of every stainless canister as canisters are lowered in carbon steel lined concrete casks or UMAX storage holes? This can trigger initiation of cracks which can then continue to grow through the walls of the canisters. The NRC has stated once cracks start they can grow through the walls in 16 years.

Details at this link:

<https://sanonofresafety.org/2018/11/29/11-29-2018-nrc-admits-san-onofre-holtec-nuclear-waste-canisters-are-all-damaged/>Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: Why would people trust the DOE given the continual radiation releases in rivers and other environmental radiation releases at multiple DOE nuclear waste sites? This has been happening for decades.

Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: Is the DOE aware that overpacks cannot be used to store damaged canisters. The canisters would lose their air cooling system, so would overheat. NRC evaluated this with Big Rock Point years ago. And Big Rock canisters had much cooler fuel assemblies than are used now.

Name: Don Hancock

Affiliation: Southwest Research and Information Center

Comment: How is the process dealing with a seemingly impossible contradiction? That is that it's a temporary interim storage facility, but there is no permanent repository. If a community/state consents to an interim storage facility for a limited timeframe, but the community/state has no authority or ability to have the waste moved by a time certain, how can that be real consent? If the community/state will only consent if there is an operating repository, does that meet the interim storage objective?

Name: Rich Janati

Affiliation:

Comment: It might be a good idea for the DOE to conduct a public value survey and based on the survey results prioritize the issues or topics that are of importance to the public as it relating to hosting the facility such as transportation, health monitoring, etc.

Name: Kalene Walker

Affiliation:

Comment: Regarding Demo Cask project: Where will the fuel be retrieved from the cask for evaluation? What hot cell facility?

Name: Kalene Walker

Affiliation:

Comment: With almost 4,000 loaded canisters, isn't it unfortunate that no real data from actual canister fuel can be obtained or analyzed because no fuel handling facility exists in U.S. to open a canister.

Models, sibling pins and test casks can be interesting, but that is not actual real canister fuel data, right?

Name: Kalene Walker

Affiliation:

Comment: Would you bet your life on these models and analysis, because you're betting OUR lives on it.

Name: Kalene Walker

Affiliation:

Comment: Has any gas sampling been taken from the Demo Cask?

Name: Tony Leshinskie

Affiliation: Vermont Public Service Department

Comment: Does the modeling performed to date indicate that BWR Fuel or IFBA pellets will have significantly different results observed in the PWR fuel assemblies examined thus far? Do you expect the PWR fuel designs examined thus far to be bounding for other fuel types or are they expected to be typical results?

Name: Kalene

Affiliation:

Comment: Many licensees do not do sipping tests to accurately assess condition of fuel before loading. And the drying process is possibly questionable, canister to canister. Do models account for these unpredictable inconsistencies?

Name: Kalene Walker

Affiliation:

Comment: At some point, it would be helpful if the the DOE could SPECIFICALLY clarify what the Disclaimer is referencing. They always start with it.

Name: Kalene

Affiliation:

Comment: Considering “repository” safety of new fuels from new reactors seems premature. It seems ‘long term canister storage’ would be more relevant.

Name: Kalene Walker

Affiliation:

Comment: Vendors of new reactors do not have actual data. They only have models, right?

Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: No thin-wall canisters have been opened and inspected. A thick-wall cask was used. A hot cell facility is needed. None exist in the US designed for this. The Swiss have what we need.

Hanson said in the Zircoloy-4 fuel rod cladding in their testing it shows lots of hydrogen. Not good. Most canisters in storage are Zircoloy-4. Until fuel rods are inspected as required by NWPA and NRC and ASME requirements. Until all fuel is repackaging into thick-wall casks, all efforts for CIS should be stopped. Please tell Congress this needs to be done so they quit wasting our money.

Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: The transport test was not done with radiated fuel rods, so is not adequate to state transport of these fragile and dangerous fuel rods is safe. The public needs to know the truth.

Name: Donna Gilmore

Affiliation: SanOnofreSafety.org

Comment: Numerous safety issues on storage and transport risks are included in my comments to NRC NUREG-2224. These have never been adequately addressed by the NRC.

NUREG-2224 High Burnup Fuel Storage and Transport Comments

<https://sanonofresafety.org/nureg-2224-high-burnup-storage-and-transport/>