

DOCKETED

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Comment Received From: Donna Gilmore

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Recommendations to the CEC on California Nuclear Waste

California thin spent fuel nuclear waste storage canisters may fail as early as 20 years after first loading. For San Onofre this would be 8 years from now. The CEC should include the following policy recommendations and requirements. The current Holtec and Areva NUHOMS dry storage systems do not meet these requirements. The CEC state nuclear policy should include minimum California dry storage requirements to ensure adequate funding and storage for new 100+ year storage requirements. I understand the CPUC has cost jurisdiction, but the CEC can establish state policy on this issue, even though the CPUC may be the one to enforce some of this policy as it relates to cost.

1. Do not allow purchase of dry storage technology for California that does not meet these minimum requirements.
2. Maintainable – We do not want to buy these canisters more than once. Seals are maintainable, cracked canisters are not.
3. Early warning prior to failure and prior to radiation leaks.
4. Inspectable, repairable and not subject to cracking, particularly through-wall cracks.
5. Cost-effective for the expected life of the system and transportable.
6. Ability to reload fuel without destroying container.
7. Do not allow purchase of vendor promises – itâ€™s not state policy to purchase non-existent features (e.g., vaporware). That is what we're being asked to approve with the San Onofre Holtec contract.
8. Require bids from all leading international vendors to ensure the best storage technology available is evaluated and selected. The NRC must still license the system, but we should be able to select the one that is the most cost-effective and best suited to our environment.
9. Require replacement of existing thin canisters before the time period in which they may fail.
10. Store in hardened concrete buildings for additional environmental protection, similar to what is done in other countries, such as Germany.
11. Require a fully developed mitigation plan be provided by the utilities now.
12. Do not allow destruction of empty spent fuel pools until nuclear waste is removed from site. No other option is available to replace failed canisters.
13. Install continuous radiation monitors with on-line public access. Allow decommissioning funds to be used for this purpose.
14. Continue emergency planning and required funding until waste is removed from California.

Additional details on attachment.

Donna Gilmore

SanOnofreSafety.org

Additional submitted attachment is included below.

Subject: Recommendations to the CEC Docket 15-IEPR-12 Nuclear Power Plant Nuclear Waste
From: Donna Gilmore <dgilmore@cox.net>
Date: 5/5/2015 12:30 PM
To: Kevin Barker - CEC <kevin.barker@energy.ca.gov>, Rob Oglesby <Rob.Oglesby@energy.ca.gov>
CC: Peter Lam <peterlam1@aol.com>

Based on evidence I provided to the CEC, California thin spent fuel nuclear waste storage canisters may fail as early as 20 years after first loading. For San Onofre this would be 8 years from now. Therefore, this is an urgent issue for the State of California.

I spoke to Peter Lam after my April 27th CEC presentation on the dry storage canister problems. Peter was not aware of the issues I presented and told me these issues deserve further investigation, but that he is not the right person to do this. Please advise what the next steps might be to address this with the CEC.

I know Chairman Weissmuller is concerned about federal preemption. However, state policy can include these policy recommendations and requirements. The current Holtec and Areva NUHOMS dry storage systems do not meet these requirements.

The CEC state nuclear policy should include minimum California dry storage requirements to ensure adequate funding and storage for new 100+ year storage requirements. I understand the CPUC has cost jurisdiction, but the CEC can establish state policy on this issue, even though the CPUC may be the one to enforce some of this policy as it relates to cost.

- Do not allow purchase of dry storage technology for California that does not meet these minimum requirements.
 - Maintainable – We do not want to buy these canisters more than once. Seals are maintainable, cracked canisters are not.
 - Early warning prior to failure and prior to radiation leaks
 - Inspectable, repairable and not subject to cracking, particularly through-wall cracks
 - Cost-effective and transportable
 - Ability to reload fuel without destroying container
- Do not allow purchase of vendor promises – it's not state policy to purchase non-existent features (e.g., vaporware). That is what we're being asked to approve with the San Onofre Holtec contract.
- Require bids from all leading international vendors to ensure the best storage technology available is evaluated and selected. The NRC must still license the system, but we should be able to select the one that is the most cost-effective and best suited to our environment
- Require replacement of existing thin canisters before they fail
- Store in hardened concrete buildings for additional environmental protection, similar to what is done in other countries, such as Germany
- Require a fully developed mitigation plan be provided by the utilities now.
- Do not allow destruction of empty spent fuel pools until nuclear waste is removed from site. No other option is available to replace failed canisters.
- Install continuous radiation monitors with on-line public access. Allow decommissioning funds to be used for this purpose.
- Continue emergency planning until waste is off-site

I urge you to make this a priority issue and include me in future discussions on this issue. I have

done considerable research and have consulted with material engineers and others on these critical problems. There is considerable misinformation on these issues that I have investigated and can dispel.

The Nuclear Regulatory Commission only licenses dry storage systems for 20 years and excludes aging issues that may occur after those 20 years. Therefore, it's up to California to address this. California ratepayers fund these systems and California taxpayers will live with the consequences of failure of those systems.

When California issued the initial permits for dry storage, we may not have known that the dry storage systems had critical flaws and we may not have known they would likely be here for longer term storage. But we know now.

California frequently leads the nation to solve critical issues. We need to step up and do this again. Even the short-term financial future of California depends on it.

Thank you,

Donna Gilmore
SanOnofreSafety.org
San Clemente resident

Link to my slide presentation, California's Nuclear Waste -- Problems and Solutions
<https://sanonofresafety.files.wordpress.com/2014/10/dry-cask-storage-donna-gilmore-2015-apr-27.pdf>