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Storage containers for spent nuclear fuel

To: California Energy Commission

Re: Docket 15-IEPR-12 Nuclear Power Plants

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 state policy recommendations and requirements. (California Holtec and Areva NUHOMS thin dry storage canisters 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. The California Public Utilities Commission (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 â€“ 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, if required, without destroying storage container.

7. Do not allow purchase of vendor promises â€“ itâ€™s not state policy to purchase non-existent features (e.g., vaporware). That is what weâ€™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 Nuclear Regulatory Commission (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.

See Californiaâ€™s Nuclear Waste Problems and Solutions, Donna Gilmore, IEPR Nuclear Power Workshop presentation, April 27, 2015 https://sanonofresafety.files.wordpress.com/2014/10/dry-cask-storagedgilmore2015apr27.pdf

Thank you.