

Citizens' Oversight Projects (COPs)

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To: Jill.caverly@nrc.gov

Comments on HOLTEC Eddy-Lea Facility:

1. DESIGN LIFE should be greater than the LICENSE TERM. The Design life SHOULD be based on realistic expectation of the actual required life of the facility. License term can remain 40 years, but even if we expected that an alternative location will be available in 40 years, the Design Life should be greater than the expected required use term. For example, we know that the spent fuel will need to be “aged” on the surface until it cools sufficiently to put into any geologic repository. The Yucca Mountain plan says they will have to ventilate the facility for 150 years. So it seems the required life of a surface facility should be at least 150 years, if we are lucky enough to have YM or another facility open by then which can accept the waste. So the design life should be $C * 150$, where C is the measure of conservatism, and is a positive number, like perhaps 1.5 or 2. That would put the design life at 225 to 300 years, not 40.

The design life must not be the same as the license term or you have NO CONSERVATISM and you are asking for failure rather than safety. Because we do not know how long it will be necessary to keep the spent fuel at this location, it SHOULD be designed for INDEFINITE life (with maintenance).

No matter how you look at it, talking about a 40-year design life is ridiculous.

2. The VAULTS in the Holtec facility SHOULD be large enough to contain the canister PLUS an additional outer shell to allow for a dual-wall design, to provide EXTENDED life. There is no plan for actions to take if a canister should become compromised and venting significant radioactive particles. Usually, the plan is to enclose the canister in an additional larger enclosure. But if you do that, where do you store it? Again, the vaults should be larger than the minimum required for just the MPC-37, for example.

Please consider mandating that the facility be HELMS Compliant. See more here:
<http://copswiki.org/Common/HelmsProposal>. This is before the NRC at this time as
<https://www.regulations.gov/docket?D=NRC-2018-0017>

3. The scope should include unloading and loading operations and likely transportation routes to and from the facility. Should include failure response, i.e. if a canister develops a crack, what is to be done? Saying it should be sent back to the sender is unacceptable.

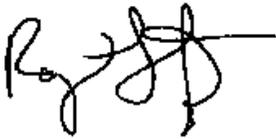
3. I am worried about the stability of the ground in that area as there is so much mining going on around it. This may not be the best location from this standpoint.

4. The design of the facility assumes there is no need for hardening it against attack. For example, the thin metal surface building only robust enough to exclude weather is proposed for the cask handling facility. Please consider a more robust building that may thwart simple explosive attacks.

5. The Holtec UMAX design has a severe problem. If there is any failure to remove the canister or for some unexpected reason, the canister has deteriorated substantially, there is no easy way to access the canister or remove it. In contrast the Areva/Transnuclear NUHOMS horizontal enclosures can be disassembled and the canister accessed from the top, under similar circumstances. I believe that even though this is not a predicted scenario, there should be a plan should this occur. We have no real experience over longer periods of time and a canister has never been removed from the vaults.

For example, the Holtec facility may need to be limited to only two-canisters in width to allow excavation next to the concrete enclosure, and thus access the canister from the side. Essentially, we need to envision failure scenarios and define how we can deal with them. In the current design, there is an assumption that all will be well forever.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ray Lutz', with a stylized flourish extending to the right.

Raymond Lutz
National Coordinator, Citizens' Oversight Projects