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From: J Merrigan [jnmwem@gmail.com]
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To: Energy - Docket Optical System; Bailey, Stephanie@Energy
Subject: 14-IEP-1 - COMMENTS on Draft 1014 IEPR Update

Categories: Ready to Docket



The 2014 IEPR Update addresses important issues regarding crude oil delivery by rail, and the development of electrical vehicle infrastructure, but I am disappointed that it ignores new developments related to nuclear waste storage in California. CEC policy recommendations regarding nuclear waste storage are out of date. They need to be updated so that California policy is based on the latest research and the best technology for safe storage of nuclear waste.

I recommend that the CEC hold a workshop on nuclear waste storage issues on an urgent basis, no later than January 2015.

Issues that must be addressed include:

- ** With no federal storage facility available, the NRC has approved continued storage of nuclear waste at current sites on into the indefinite future.
- ** Southern California Edison is currently pursuing the purchase of inferior nuclear waste canisters for the IFSFI at San Onofre (the dry storage facility, which houses fuel rods once they are removed from the fuel pools). The models Edison is considering are thin (5/8" thick) and have welded lids not designed to be removed. Higher quality cask systems, such as the thick (almost 20" thick) German ductile cast iron casks have bolted lids which are maintainable and have lid monitoring for early warning of potential leaks. The thin canisters are not maintainable and do not have an early warning system.
- ** There is no backup plan should dry storage nuclear waste canisters fail. While NRC representatives have suggested the dry waste could be re-deposited into fuel pools, the truth of the matter is that fuel pools have already been removed from the Rancho Seco and Humboldt Bay facilities.

Donna Gilmore of San Onofre Safety was a presenter last month at the NRC's Division of Spent Fuel Management (DSFM) Regulatory Conference (REG CON) in Washington, D.C. An edited video with highlights of her presentation at REG CON is available here: <https://www.youtube.com/watch?v=KvAbDX0R2Eg&sns=em> . It provides a good overview of current nuclear waste issues that must be immediately addressed.

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