

State of Vermont
Department of Public Service
112 State Street
Montpelier, VT 05620-2601
TEL: 802-828-2811

FAX: 802-828-2342
TTY VT: 800-734-8390
email: vtdps@state.vt.us
<http://publicservice.vermont.gov/>

July 31, 2013

Ms. Cindy Bladey
Chief, Rules, Announcements, and Directives Branch (RADB)
Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments to Docket ID NRC-2013-0136, Draft Report on Consequence Study of a Beyond-Design-Basis Earthquake Affecting the Spent Fuel Pool for a U.S. Mark I Boiling Water Reactor

Dear Ms. Bladey:

The Vermont Department of Public Service hereby submits comments to the Draft Report dated June 2013 entitled "Consequences Study of a Beyond-Design Basis Earthquake Affecting the Spent Fuel Pool for a U.S. Mark I Boiling Water Reactor." As an initial matter, the Department supports the request made by others (such as the New York Attorney General's Office) that the comment period be extended to allow for an adequate review of a complicated study. Given the strictly limited time period provided for comment, the Department can only provide very brief comments at this time, and the Department thus reiterates the need for extending the comment period to ensure greater public participation in this matter. If the comment period is extended, the Department will provide more extensive comments to the NRC. In the meanwhile, the Department provides the following two comments on the study:

First, the study finds that there is an increased risk of a radiological release from a spent fuel pool within the first few months after fuel is moved from the reactor into the spent fuel pool. The Department thus requests that the NRC research all measures that can be taken by nuclear power plants to reduce the risks of a radiological release during refueling when "hot" fuel is present in the spent fuel pool. The goal of the NRC should be to prevent any radiological release.

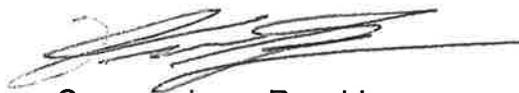


Second, the study explicitly found that there are beneficial effects in the form of a reduction in offsite consequences, such as land contamination when a nuclear power plant moves from a high-density spent fuel pool loading scenario to a low-density scenario. Because measures can be taken to reduce the potential of land contamination which would also result in a reduction of radiation dose to the public and subsequent health effects, the NRC should consider immediately ordering reductions of spent fuel assemblies stored in a pool.

Again, the Department reiterates the need to extend the comment period for this study, and today's comments should by no means be considered comprehensive. The Department would welcome the opportunity to submit more extensive comments on the many issues raised by this study and asks for more time to do so. In the interest of increased public participation, the NRC should extend the comment period.

Sincerely,

Darren Springer, Deputy Commissioner



*for Chris
Recchia*

Commissioner Recchia
Vermont Department of Public Service