

The Environmental Impact Statement Does Not Address Security Concerns Regarding the Structural Vulnerabilities of the Peach Bottom Elevated Irradiated Fuel Storage Ponds

Every refueling cycle, Peach Bottom's operators off load one third of the highly radioactive and extremely hot nuclear fuel from the reactor core and submerge it into 40-feet of water in elevated storage ponds for thermal cooling and radiation shielding for a minimal period of five-years. The Peach Bottom elevated storage ponds are located approximately between the 6th and 10th story of each reactor building. Referred to as the "spent" fuel pool in industry jargon, each storage pond is currently filled with hundreds of tons of high-level radioactive waste. As long as the reactors are operating they are constantly cycling thermally hot radioactive fuel rods into the attic of the reactor.

It is NIRS' stated concern that these elevated storage ponds are extremely vulnerable to a variety of acts of radiological terrorism. The Environmental Impact Statement does not adequately address the increased risk by significantly extending the Peach Bottom operating license and the adverse environmental impact associated with a successful terrorist attack on this vulnerable target.

As reported by NRC's own Technical Study of Spent Fuel Pool Accident Risk at Decommissioning Nuclear Power Plants published in October 2000, before the attack on the World Trade Center and the Pentagon, "Mark I and Mark II secondary containments generally do not appear to have any significant structures that might reduce the likelihood of aircraft penetration [of the spent fuel pool], although a crash into 1 of 4 sides of the BWR secondary containment may be less likely to penetrate because other structures are in the way of the aircraft." In other words, the Peach Bottom's 40-foot deep "spent" fuel pool shares only one of its walls in common with the exterior of the reactor building. NRC goes on to state "Based on studies in NUREG/CR-5042, Evaluation of External Hazards to Nuclear Power Plants in the United States, "it is estimated that 1 of 2 aircrafts are large enough to penetrate a 5-foot-thick reinforced concrete wall." The NRC report goes on to state, "It is further estimated that 1 of 2 crashes damage the spent fuel pool enough to uncover the stored fuel (for example, 50 percent of the time the location of the damage is above the height of the stored fuel.)"

As stated earlier, the top of the reactor building surrounding the opened surface of the "spent" fuel pool is basically sheet metal siding with a specified blow-out rating. What is the "blow in" rating is for this section of the Peach Bottom reactors? Where has NRC structurally analyzed this section of the reactor building and evaluated the degree of risk associated with extending the time at which we are vulnerable to the consequences of off site radiation releases from an act of radiological sabotage against Peach Bottom?

NIRS contends that the identified vulnerability is an unacceptable risk with unacceptable consequences in the clear and present danger of a Post-September 11th world. A re-licensing proceeding that turns a blind eye on this glaring vulnerability is a dangerous sham on the public health and safety and the environment.