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Consideration on Environmental Impacts on Temporary Storage of Spent Fuel After Cessation of Reactor Operation

Comment On: NRC-2012-0246-0001

Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation

Document: NRC-2012-0246-DRAFT-0058

Comment on FR Doc # 2012-26295

10/25/2012

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77 FR 65137

Submitter Information

Name: Yunjoo Goze

General Comment

Please see the attachment

Attachments

DocketID-NRC-2012-0246

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Add= S. Lopas (SLL2)



November 11, 2012

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

Re: Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After
Cessation of Reactor Operation
Docket ID: NRC-2012-0246

Dear Ms. Bladey:

Thank you for providing the opportunity to comment on the scoping process for Environmental Impact Statement ("EIS") for a new Waste Confidence Decision and Rule. I am a resident of Michigan and very much concerned about the safety of storage of spent nuclear fuel.

After decades of battle over permanent repository sites, Yucca Mountain was abandoned as a viable option in 2009. This means that spent fuel storage facilities at the nuclear power plants may become permanent facilities. While there is no progress in permanent solution, the amount of spent fuel is increasing. Therefore, thorough and comprehensive EIS is imperative to protect human health and environment.

Currently, spent fuel rods are placed in storage pools after they are discharged from nuclear reactors. When spent fuel rods cool down enough in storage pools, they can be moved to dry casks. The Commission needs to evaluate and analyze possible risks associated with storage pools and dry casks. As we have witnessed in the Fukushima incident, storage pools are very vulnerable to natural disasters. Even though the D.C. Circuit did not require site-by-site examination, different designs and locations of nuclear plants can produce very different consequences for natural disasters. The Commission should account for these differences. The Commission also needs to pay careful attention to terrorist attacks, human errors, and equipment malfunction.

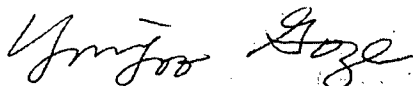
Groundwater contamination from storage pool leaking is very troubling. As the D.C. Circuit noted, the Commission has to analyze possibilities of future leaks and health effect of those possible leaks. The Commission already admitted a few incidences of leaks but dismissed those leaks as harmless because it concluded that the harmful impact from those leaks were negligible. This does not guarantee that future leaks also will be harmless. Again, differences in design and location of nuclear reactors need to be considered for this analysis. Particularly, harmful consequences of leaks can be dramatically different depending upon the location of the nuclear plant. The D.C. Circuit also noted deficiency of analysis in the possibilities of storage pool fires. The Commission needs to examine both possibilities and consequences of storage pool fires.

The Commission also needs to keep in mind that these storage facilities are deteriorating. Some of these facilities are built decades ago. To be able to store spent fuel safely many years after nuclear plants licensed life, deterioration has to be considered. At this point, it is not clear how many years that will be because there is no indication that there is going to be a permanent repository. As the D.C. Circuit emphasized, the Commission must assess the potential impact of the government's failure to establish permanent repositories in the future.

As required under the NEPA, EIS must include alternatives and each alternative must be rigorously explored and objectively evaluated. Reducing the amount of spent fuel could be one option. This can be accomplished by halting issuance of new reactor licenses and license renewals. The cost and benefit of this alternative should be explored. In addition, dry casks are safer and easier to operate than storage pools. The Commission should develop a mechanism to move spent fuels from storage pools to dry casks as soon as they are cool enough to be stored in dry casks.

Finally, the Commission should not rush to any premature conclusion. The Commission is planning to issue EIS and a new Waste Confidence Rule by September 2014. There may not be enough time for comprehensive evaluation of all environmental impacts by the set deadline. I know that the Commission decided to stop all licensing activities after the D.C. Circuit's decision. However, industry pressure should not push the Commission to issue a hasty rule. The Commission should take sufficient time to fully analyze all environmental impacts.

Respectfully,

A handwritten signature in cursive script, appearing to read "Yunjoo Goze".

Yunjoo Goze