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

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

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General Comment

This is a citizen comment for the NRC's environmental scoping sessions on Wednesday, November 14th regarding what should be included in the NRC's Environmental Impact Statement (EIS) on court-ordered changes to its Nuclear Waste Confidence Decision and Rule.

NRC has not done an EIS on the risks of on-site storage of high-level radioactive waste in pools and dry casks. Last June, the D.C. Circuit Court of Appeals nullified NRC's 30 year old Nuclear Waste Confidence Decision and Rule, and ordered the agency to carry out an EIS. In 2010, the NRC had ruled that high-level radioactive wastes were safe and sound at reactor sites for at least 120 years, and the NRC was considering extending that ruling out to 200 to 300 years. The court nullified this, ordering an EIS. I urge the NRC to not attempt to short-circuit a full and proper EIS in any way.

The NRC should grant an extension of time for the environmental scoping hearings, and grant an extension of time for the entire environmental scoping process. There has been a lack of adequate information in the Federal Register Notice. These are basic components of any National Environmental Impact Statement (NEPA) environmental impact statement process.

I ask that the NRC withdraw the scoping notice and re-publish it in a form that passes legal muster

under NEPA. The NRC needs to hold regional hearings.

The solution that I urge the NRC to implement: Hardened On-Site Storage (HOSS). HOSS is a sensible, scientifically validated interim alternative to high-risk transport of radioactive waste, and HOSS is also a much safer and more sensible alternative to pool and dry cask storage. HOSS has been thoroughly researched and is endorsed by a wide range of subject matter experts on radioactive waste storage. Please heed their message and mandate HOSS for all radioactive waste.