

PUBLIC SUBMISSION

As of: November 27, 2012
Received: November 21, 2012
Status: Pending_Post
Tracking No.: Ijw-823w-76hw
Comments Due: January 02, 2013
Submission Type: Web

Docket: NRC-2012-0246

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-0091

Comment on FR Doc # 2012-26295

10/25/2012
77 FR 65137

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2012 NOV 27 AM 9:19

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General Comment

See attached file(s)

Attachments

The preferred alternative is to stop making irradiated nuclear fuel

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Template = ADM - 013
E-RIDS= ADM-03
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The preferred alternative is to **stop making irradiated nuclear fuel**. NRC should cease licensing atomic reactors, which inevitably generate high-level radioactive waste, deadly for at least a million years. This includes the rejection of any more combined Construction and Operating License Applications (COLAs) for proposed new atomic reactors, such as those recently rubberstamped by NRC at Vogtle, GA and Summer, SC. But this also includes the rejection of any more 20 year license extensions, as NRC has rubberstamped at 73 reactors since the year 2000. Thus, such pending license extensions as at Indian Point 2 & 3 (NY), Crystal River 3 (FL), Diablo Canyon 1 & 2 (CA), Seabrook (NH), Davis-Besse (OH), South Texas 1 & 2 (TX), Limerick 1 & 2 (PA), Grand Gulf 1 (MS), and Callaway (MO) should all be rejected by NRC. (Beyond Nuclear has successfully applied the Nuke Waste Con Game victory to win from NRC two year delays in the finalization of licensing approvals for new reactors at Grand Gulf 2 in MS and Fermi 3 in MI, as well as for 20 year license extensions at Grand Gulf 1 in MS and Davis-Besse in OH. A coalition of two dozen environmental groups has applied the victory against three dozen new and old reactor licensing proceedings across the U.S.)

For the nearly 70,000 metric tons of irradiated nuclear fuel currently stored at U.S. atomic reactors, **Hardened On-Site Storage (HOSS)** should be required. Pools, at risk of leaks, as well as catastrophic radioactivity leaks due to sudden drain downs or slower motion boil downs, should be emptied. The irradiated nuclear fuel should be transferred into on-site dry casks which are: designed and built to last for centuries; camouflaged to deter, and fortified to withstand, terrorist attacks; safeguarded against accidents; and prevented from corroding and leaking high-level radioactive waste into the environment, as by replacement once per generation, requiring either a pool or a hot cell in which to carry out such transfer operations. Since 2002, nearly 200 environmental groups have called for HOSS, but this has fallen on deaf ears at NRC.

The risks of pool leaks into groundwater, which then flow into surface waters downstream -- as have occurred at Indian Point 2 & 3 (NY/Hudson River), Salem 1 (NJ/Delaware River), CT Yankee (Connecticut River & Long Island Sound), the U.S. Dept. of Energy's Brookhaven High Flux Beam Reactor (Long Island's sole source drinking water aquifer), BWXT Technologies (VA/James River), as well as Hatch (GA/Altamaha River) and Davis-Besse (OH/Lake Erie) -- must be considered in this EIS.

The risks of pool fires must be considered in this EIS. The precarious situation at Fukushima Daiichi Unit 4 --where a 7.0 earthquake could cause the complete collapse of the reactor building -- risks 135 tons of irradiated fuel catching fire, and releasing ten times the radioactive cesium-137 as was released by the Chernobyl nuclear catastrophe, directly into the environment. This would dwarf the radioactivity released thus far by the Fukushima nuclear catastrophe. But pools at most U.S. atomic reactors contain several times more high-level radioactive waste than does Fukushima Daiichi Unit 4, meaning the potential catastrophes downwind, downstream, up the food chain, and down the generations would be even worse here in the event of a pool fire, whether caused by a sudden drain down (due to an earthquake, heavy load drop, terrorist attack, etc.) or a slower motion boil down (due to loss of off-site electricity, whether due to a natural

disaster such as a hurricane, an intentional attack, a reactor accident causing abandonment of the nuclear power plant site, etc.).

The risks of current dry cask storage must also be considered in this EIS. Lack of quality assurance on design and fabrication of dry casks, as revealed by industry and even NRC whistleblowers, calls into question the structural integrity of dry casks currently used for on-site storage. Current dry casks, almost all stored outdoors in plain site, have not been designed to withstand terrorism, such as an attack by TOW anti-tank missiles. Dry casks have also suffered many accidents, such as hydrogen explosions, inner seal leaks risking fuel rod corrosion and radioactive gas leaks, as well as seismic damage.

Lou Zeller of Blue Ridge Environmental Defense League (BREDL), one of the environmental groups which won the June 8th court ruling victory, has also submitted comments.

Pat Birnie, of GE Stockholders Alliance, has also submitted comments to the NRC Commissioners on their Nuclear Waste Confidence Rule. On April 25, 2012, Beyond Nuclear's Kevin Kamps had the honor of presenting the GE Stockholder Alliance's resolution to General Electric CEO Jeff Immelt and assembled GE shareholders at the company's annual meeting, held in Detroit, Michigan. Recently, Immelt stated that new atomic reactors are not economical.