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General Comment

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; camoflagued 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.

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