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

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General Comment

Preferably stop making irradiated nuclear fuel and cease licensing atomic reactors. Reject more COLAs for new atomic reactors. Reject any more license extensions. 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.
For irradiated nuclear fuel stored at U.S. atomic reactors, Hardened On-Site Storage (HOSS) should be required. Pools, at risk of leaks, should be transferred into on-site dry casks which are: designed and built to last for centuries, withstand, terrorist attacks; safeguarded against accidents; and prevented from corroding and leaking high-level radioactive waste into the environment.
The risks of pool leaks into groundwater, which then flow into surface waters downstream -- as have occurred at Indian Point 2 & 3, Salem 1, CT Yankee, the U.S. Dept. of Energy's Brookhaven High Flux Beam Reactor BWXT Technologies, as well as Hatch and Davis-Besse-- must be considered in this EIS.
The risks of pool fires must be considered. The precarious situation at Fukushima Daiichi Unit 4 --where a 7.0 earthquake could dwarf the radioactivity released thus far by the Fukushima nuclear catastrophe. Pools at U.S. atomic reactors have more high-level radioactive waste than Fukushima Daiichi Unit 4, so catastrophe would be even worse here. Risks of dry cask storage must also be considered. Lack of quality assurance of dry casks, as revealed industry and even NRC whistleblowers, calls into question the structural integrity of dry casks. 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 hydrogen explosions, inner seal leaks risking fuel rod corrosion and radioactive gas leaks, as well as seismic damage.

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