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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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Submitter Information

Name: Rodney Derbigny
Address:
PO Box 16303
Sugar Land, TX, 77496

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General Comment

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 73 reactors since the year 2000. Thus, such pending license extensions as at Indian Point 2 & 3, Crystal River 3, Diablo Canyon 1 & 2, Seabrook, Davis-Besse, South Texas 1 & 2, Limerick 1 & 2, Grand Gulf 1, and Callaway should all be rejected by NRC.

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, Salem 1, CT Yankee, the U.S. Dept. of Energy's Brookhaven High Flux Beam Reactor, BWXT Technologies, as well as Hatch and and Davis-Besse, must be considered in this EIS.

The risks of current dry cask storage must also be considered in this EIS

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