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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: William Maurer
Address:
140 Gifford Street
Falmouth, MA, 02540
Organization: PANA

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General Comment

The NRC should prevent the generation of irradiated nuclear fuel by denying licensing of proposed new nuclear reactors and denying more 20-year license extensions. Nuclear plants inevitably generate high-level radioactive waste, which is deadly for at least a million years and for which no safe transport and storage methods exist.

Moreover, the NRC should require Hardened On-Site Storage (HOSS) for the nearly 70,000 metric tons of irradiated nuclear fuel currently stored at U.S. atomic reactors, 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: designed and built to last for centuries; camouflaged and fortified to deter and 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.

The EIS must consider the risk of pool leaks into groundwater, which then flows into surface waters downstream. Such leaks have occurred at several facilities.

The EIS must consider the risks of pool fires, which could release into the environment many times more radiation than was released at Fukushima because pools at most U.S. nuclear reactors contain several times more high-level radioactive waste than does Fukushima Daiichi Unit 4..

Also the EIS must consider the risks of current dry cask storage. Lack of quality assurance on design and fabrication of dry casks, casts doubt on the the structural integrity of current dry casks, most of which are stored outdoors in plain sight, and are not designed to withstand terrorism and earthquakes, and have had many accidents.

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