



SNAKE RIVER ALLIANCE
 IDAHO'S NUCLEAR WATCHDOG & CLEAN ENERGY ADVOCATE

10/25/2012

47 FR 65137

January 2, 2013

Cindy Bladey,
 Chief, Rules, Announcements, and Directives Branch (RADB)
 Office of Administration
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 U.S. Nuclear Regulatory Commission
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2013 JAN -3 AM 10: 56

RULES AND DIRECTIVES
 BRANCH
 USNRC

Re: Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation – Scoping comments

Dear Ms. Bladey:

The Snake River Alliance was founded in 1979 and is Idaho's grassroots nuclear watchdog and clean energy advocate. The following scoping comments are submitted on behalf of our dues-paying members.

"Spent nuclear fuel" has a sound legal definition and substantial legal and legislative history. As the Nuclear Regulatory Commission (NRC) embarks on consideration of how to manage irradiated nuclear fuel that has been withdrawn from a reactor, it is advisable to use the legal term.

The availability of a permanent repository for spent nuclear fuel is not at all certain. "Indefinite" storage can be for a very extended period of time, perhaps forever. The Alliance encourages the NRC to develop a "no action" alternative that acknowledges this reality, including the environmental consequences of continuing to license or relicense reactors.

The draft EIS must include a full evaluation of hardened on-site storage (HOSS).

The Alliance questions the value of a "generic" environmental impact statement for "temporary" spent fuel storage. Typically, the most "generic" assumption is that nothing can or will go wrong. But in the particular, diverse environments where spent nuclear fuel is produced and stored, that assumption is not correct, and it is incorrect in a whole array of ways.

The draft EIS must analyze the full range of spent nuclear fuel types from those already amassed at reactor sites to the high burn-up fuel more recently produced and the MOX spent fuel that may result from current proposals.

The storage of spent fuel is a very serious, long-term environmental, economic, and social endeavor. The Alliance is concerned that the aggressiveness of NRC's current draft EIS schedule might be more responsive to political concerns.

We thank the NRC for providing webcasts and conference calls for its initial meetings on this draft EIS. But the agency must go further to capture the breadth of public issues and concerns surrounding the production and storage of spent nuclear fuel.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Beatrice Brailsford".

Beatrice Brailsford
Nuclear program director