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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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USNRC**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 at 73 reactors since the year 2000. Thus, such 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. (Beyond Nuclear has successfully applied the Nuke Waste Con Game victory to win from NRC two year delays in the finalization of licensing approvals for new reactors at Grand Gulf 2 in MS and Fermi 3 in MI, as well as for 20 year license extensions at Grand Gulf 1 in MS and Davis-Besse in OH. A coalition of two dozen environmental groups has applied the victory against three dozen new and old reactor licensing proceedings across the U.S.)

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 operatio

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