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

Comment On: NRC-2012-0246-0001

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

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## General Comment

No more NRC licenses enabling atomic reactors to generate high-level radioactive waste. I urge NRC to include in its EIS scope the preferred alternative of the agency not approving any more new reactor combined Construction and Operating License Applications (COLA), nor approving any more old reactor 20-year license extensions.

For wastes that already exist, I urge NRC to require Hardened On-Site Storage. High-level radioactive waste must be transferred out of water pools, at risk of catastrophic radioactivity releases in the event of a loss of cooling and consequent radioactive waste inferno. But on-site dry cask storage must be significantly upgraded. Dry casks must be designed and fabricated well, with full quality assurance. They must be designed to withstand terrorist attack (as by camouflage, fortifications, and adequate spacing in between casks), to safeguard against accidents, and to prevent radioactivity leakage into the environment for the decades or centuries the wastes will be stuck at the reactor sites. The risks of pool fires must be considered in this EIS. Radioactivity leaks from storage pools – into soil, groundwater, and surface waters – should also be included in the EIS scope. Seismic risks to dry cask storage – must also be included in the EIS.

Thank you,

SUNSI Review Complete

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