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**Docket:** NRC-2012-0246

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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USNRC**General Comment**

As a systems engineer who has worked on the Space Shuttle program, I would like to note that program was terminated because the design lifetime was reached, and the government chose not to do the necessary engineering to extend that design lifetime. I am appalled to learn that the NRC had been granting license extensions for Nuclear plants beyond their design lifetimes without such design lifetime extensions. This means that there is no safety design in effect for these plants, as any element is subject to potential failure as being outside its design envelope. This in turn means that all sorts of unknown parts are liable to failure due to use beyond their design life. It is imperative that any plant license extension be contingent upon such an engineering review, and replacement of all elements that cannot be deemed reliable for the extension period, whether due to age, wear, radiation exposure, or any other lifetime-related factor. If such elements cannot be replaced, the plant must be shut down and not re licensed.

Also, waste storage pools or facilities need to be designed or re-designed for their anticipated life, which absent a specific plan for relocation should be enough half-lives of the material to render it safe and harmless. Again, if replacement of elements is not feasible, then new repositories must be prepared that do meet these criteria, and the waste moved to them.

In particular, waste repositories that are physically dependent on structures that may be subject to failure due to prior failure of an adjacent nuclear reactor, as apparently happened at the Fukushima plants in Japan, must be closed, and their waste relocated.

Finally, sites that are likely to be breached by sea level rise within their design lifetime need to be rejected, and any waste relocated. The likely sea level rise over the next 100 to 10,000 years is about 60 meters, due to the increase in atmospheric CO2 and methane melting the Antarctic and Greenland ice caps.

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