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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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General Comment

SUBSTANCE POINTS

No more NRC licenses enabling atomic reactors to generate high-level radioactive waste.

NRC should 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. That way, no more high-level radioactive waste, for which there is no solution after 70 years of splitting atoms, will be generated. In short, STOP MAKING IT! The only safe, sound solution for high-level radioactive waste is to not make it (or, in NRC's case, allow it to be made) in the first place!

For wastes that already exist, NRC should require Hardened On-Site Storage (HOSS, a phrase coined by Dr. Arjun Makhijani of IEER in 2002; Dr. Makhijani serves as an expert witness for the environmental coalition, represented by attorneys Diane Curran and Mindy Goldstein, in this NRC proceeding) as the preferred alternative. 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. (In 2003, Dr. Gordon Edwards of IRSS published a report, commissioned by Citizens Awareness Network, entitled "Robust Storage." See the executive summary, the full report, and an illustration of a "robust storage" design for dry casks. Also see the Statement of Principles for Safeguarding Nuclear Waste at Reactors, signed by nearly 200 environmental organizations.)

Attachments

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Executive Summary Robust Storage of Spent Nuclear Fuel Jan 2003

Robust Storage of Spent Nuclear Fuel Jan 2003

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hoss_depicted