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Submitter Information

Name: David Kennedy
Address: AZ

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General Comment

The NRC must deny licenses enabling atomic reactors to generate high-level radioactive waste.

The NRC must 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. As such, no more high-level radioactive waste, for which there is no solution after 70 years, will be generated. The only safe, sound solution for high-level radioactive waste is to not allow it to be made in the first place.

For wastes that already exist, the NRC must require Hardened On-Site Storage 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, with full quality assurance, and designed to withstand terrorist attack, 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. The precarious situation at Fukushima Daiichi Unit 4 could be dwarfed by U.S. reactors, as pools at most U.S. atomic reactors contain several times more high-level radioactive waste than does Fukushima Daiichi Unit 4, meaning the potential catastrophes would be even worse here in the event of a pool fire, whether caused by a sudden drain down or a slower motion boil down.

Radioactivity leaks from storage pools – into soil, groundwater, and surface waters – should also be included in the EIS scope.

Major quality assurance violations with current U.S. dry cask storage design and fabrication must be corrected before they can be considered for use in Hardened On-Site Storage. Seismic risks to dry cask storage must also be included in the EIS.

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Add= S. Lopas (SLL2)