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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

Document: NRC-2012-0246-DRAFT-0496

Comment on FR Doc # 2012-26295

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Submitter Information

General Comment

See attached file(s)

Attachments

130102_nrc-2012-0246-0001_storage_of_spent_nuclear_fuel

SUNSI Review Complete
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Add= S. Lopas (SLL2)

Wednesday, January 2, 2013

Chief Cindy Bladley
Rules, Announcements, and Directives Branch (RADB)
Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation (Document ID NRC-2012-0246-0001)

Dear Chief Bladley,

I appreciate the June 8, 2012, ruling by the District of Columbia Circuit of the U.S. Court of Appeals ending the Nuclear Regulatory Commission (NRC) generic denial of the need to consider problems associated with the storage and management of highly radioactive irradiated nuclear fuel at reactor sites and make these comments on what the "scope" of this environmental impact statement (EIS) should include:

1) The NRC must assess the overfilling of highly radioactive irradiated nuclear fuel pools as a factor in catastrophic events, including drain-downs and fires, but also inadvertent criticality and other events where loss of pool integrity results in inability to stabilize cooling within the structure.

2) The NRC must compare and contrast the worst-case scenarios for radioactive releases and health consequences from a disruption of current dry storage, fuel pools and "hardened" dry storage. Based upon this, the NRC must examine alternative changes in its regulatory requirements for waste storage on-site since it is easy to forecast, based on existing data, that hardened storage provides a greater margin of health and safety to the public compared to over-filled pools.

3) The NRC should exclude off-site "interim" consolidation of waste storage because the transport evaluations done to date are not an adequate basis upon which to claim an increase in health, safety or security. The period of transport (likely decades) must itself be included in the overall evaluation of increased health, safety or security, where clearly it will not support such a claim.

4) One of the options that the EIS must include is no further production of this waste; based on no further licenses, no license extension and expiration of existing licenses. Inclusion of this alternative must include a consideration of the environmental and health consequences of the production of nuclear fuel since commercial production of nuclear fuel would be phased out under this alternative, but not others. The National Environmental Policy Act requires that impacts that are tied together by causation be assessed together.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
Olema, CA