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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

This comment is intended to supplement previous ones I have made, calling for seismic risks to be included in the scope of this EIS.

As previously commented, NRC Region III dry cask storage inspector, Dr. Ross Landsman, warned the NRC Chairman in Feb. 1994 about the "catastrophic consequences" which could occur if an earthquake struck the dry cask storage at Palisades nuclear power plant on the Lake Michigan shore. Although Dr. Landsman continued to speak out within the agency about his concerns for the rest of his career, until he retired a decade later, the NRC never took any positive, mitigative action to address the seismic risk.

On September 15, 2005, Dr. Landsman, now retired, filed a Declaration (Affidavit) before the NRC Atomic Safety (sic) and Licensing Board, in support of NIRS contention against the 20 year license extension sought by Palisades. Dr. Landsman affidavit held that Palisades' dry cask storage pads violate NRC earthquake safety regulations.

Dr. Landsman's affidavit is posted online at  
<http://www.nirs.org/reactorwatch/licensing/drrosslandsman0915005affidavit.pdf>

NRC has still required no action to address Dr. Landsman's concerns, 20 years after the dry cask storage pad was first installed on the sand dune. The concrete cask pad is 3 feet thick, but sits atop

55 feet of loose sand, anchored to nothing.

The Bible's injunction against “building your house upon the sand” comes to mind. Palisades' dry cask storage pad, bearing some two dozen, fully loaded, high-level radioactive waste casks, each weighing well over 100 tons, is located on a sand dune which the U.S. Army Corps of Engineers and the State of Michigan Department of Natural Resources have identified as a high-risk erosion zone. The pad, built in 1993, is less than 150 yards from the waters of Lake Michigan, a headwaters of the Great Lakes. 40 million people in 8 U.S. states, 2 Canadian provinces, and many Native American Nations draw their drinking water from the Great Lakes.