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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

This comment is to complement/supplement previous ones I have made in this proceeding. I wish to clarify that Hardened On-Site Storage is not the same thing as current, status quo dry cask storage. For example, current dry cask storage is not even designed to withstand terrorist attacks. See the following fact sheet entitled "Armor Piercing Missile Perforates High-Level Radioactive Waste Storage/Transport Cask in U.S. Army Aberdeen Proving Grounds Test," posted online at: <http://www.nirs.org/factsheets/nirsfctshdrylicaskvulnerable.pdf>

Hardened On-Site Storage, or HOSS for short (a phrase coined by Dr. Arjun Makhijani of IEER in 2002), sometimes referred to as Robust Storage, would require that dry cask storage be designed, fabricated, and operationally deployed to not only withstand terrorist attacks, but even to deter them in the first place. Casks could and should be separated by distance, so that multiple casks could not easily be hit by a single terrorist attack. Casks should also be camouflaged in some way, to make them difficult to spot, another deterrent to terrorist attack. And finally, casks should be fortified with thick concrete, steel, and or earth/gravel, yet another deterrent against terrorist attack.

The Statement of Principles for Safeguarding Nuclear Waste at Reactors, which puts flesh on the bones of the HOSS concept, is posted online at: http://ieer.org/wp-content/uploads/2010/03/HOSS_PRINCIPLES_3-23-10x.pdf
 These Principles have been endorsed by nearly 200 environmental and public interest organizations, representing all 50 states.

Dr. Gordon Edwards of IRSS, commissioned by Citizens Awareness Project, put yet more flesh on the bones of these concepts with a Jan. 2003 report entitled "Robust Storage of Spent Nuclear Fuel." The executive summary is posted online at http://ieer.org/wp-content/uploads/2010/03/HOSS_PRINCIPLES_3-23-10x.pdf
 The full report is posted online at <http://www.nirs.org/reactorwatch/security/sechossrpt012003.pdf>

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