

# PUBLIC SUBMISSION

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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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## Submitter Information

**Name:** Kevin Kamps

**Address:**

Beyond Nuclear, 6930 Carroll Avenue  
Suite 400  
Takoma Park, AL, 20912

**Organization:** Beyond Nuclear

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## General Comment

This comment is to supplement previous comments I have made calling for seismic risks to be included in the scope of this Environmental Impact Statement.

On February 17, 1994, Dr. Ross Landsman, the NRC Region III dry cask storage inspector, wrote a letter to NRC Chairman Ivan Selin. In it, Dr. Landsman warned about the risk at Palisades that an earthquake could result in high-level radioactive waste storage casks falling into Lake Michigan or being buried in loose sand.

Dr. Landsman wrote: "Actually, its (sic) the consequences that might occur from an earthquake that I'm concerned about. The casks can either fall into Lake Michigan or be buried in the loose sand because of liquefaction...It is apparent to me that NMSS doesn't realize the catastrophic consequences of their continued reliance on their current ideology."

A transcript of Dr. Landsman's letter has been posted online at:  
<http://www.nirs.org/reactorwatch/licensing/021794rosslandsmanltrnrcchairmanselin.pdf>

Underwater submersion could lead to inadvertent nuclear chain reactions in the fissile materials, namely Uranium-235 and Plutonium-239, still present in the wastes. In the presence of neutron-moderating water -- just as in an operating reactor core -- fuel rods that have been brought together in a critical mass, as due to damage from the earthquake, could spark a chain reaction.

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Taking place on the bottom of Lake Michigan, this would worsen already disastrous radioactivity releases escaping from a breached container. It would also make emergency response a suicide mission, as the gamma and neutron radiation being emitted from a damaged cask, with compromised radiation shielding, undergoing an inadvertent chain reaction, would deliver a lethal dose at close range in as little as seconds.

Another potentially disastrous scenario, burial under sand due to an earthquake, could cause wastes to dangerously overheat. So could a situation where flood waters, or mud, blocks the bottom vent on the dry casks.