

WCRM-GEIS2CEm Resource

From: Gwen L [yardarice33@hotmail.com]
Sent: Saturday, September 21, 2013 11:14 AM
To: RulemakingComments Resource
Subject: Docket ID No. NRC-2012-0246.

To Whom It May Concern:

For the HLRWs that already exist, require Hardened On-Site Storage (HOSS). Hundreds of environmental and public interest groups, representing all 50 states, have endorsed the Statement of Principles for Safeguarding Nuclear Waste at Reactors, which describes HOSS. Where possible, densely-packed, vulnerable HLRW storage pools, at risk of catastrophic fires and radioactivity releases, should be emptied into on-site dry cask storage that is "hardened": designed and built well, safeguarded against accidents, fortified against attacks, and protected against leakage into the environment. This should be expedited as a national security top priority. Locations where HOSS is not safe (places vulnerable to flooding, for example), hardened dry cask storage should be done as close to the wastes' point of generation as possible, as safely as possible. HOSS must be monitored and retrievable, and is but an interim measure. HOSS cannot be a permanent measure on the sea coasts and fresh water sources (rivers, lakes, reservoirs) of our country, due to rising sea levels and risk of leakage into our vital drinking water supplies.

Under its "indefinite storage" scenario, NRC has assumed that dry cask storage -- cask pads, inner canisters, and the dry casks themselves -- will be replaced once every 100 years, forevermore into the future. NRC assumes that Dry Transfer Systems will be built (and also replaced every 100 years), since pools will have been dismantled during decommissioning, by at most 60 years after permanent reactor shutdown. But NRC has not dealt with the very real risk that the irradiated nuclear fuel will so degrade with age that such transfer operations cannot be carried out safely or smoothly. This is especially a risk with "high burn-up fuel," that has spent more time in an operating reactor core, and is thus significantly more radioactive and thermally hot. NRC has also not provided the price tag for such future transfer and replacement operations.

Thank you for your time in reading these comments.

Sincerely,
Gwen Lambert

Federal Register Notice: 78FR56775
Comment Number: 8

Mail Envelope Properties (BAY173-W33704612B6649A2192ABA3BD230)

Subject: Docket ID No. NRC-2012-0246.
Sent Date: 9/21/2013 11:13:38 AM
Received Date: 9/21/2013 11:13:40 AM
From: Gwen L

Created By: yardarice33@hotmail.com

Recipients:
"RulemakingComments Resource" <RulemakingComments.Resource@nrc.gov>
Tracking Status: None

Post Office: phx.gbl

Files	Size	Date & Time
MESSAGE	2112	9/21/2013 11:13:40 AM

Options
Priority: Standard
Return Notification: No
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Sensitivity: Normal
Expiration Date:
Recipients Received: