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TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel

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From: Bruce Skud [<mailto:bskud@verizon.net>]

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NRC: Please confirm receipt of comment by sending an email to bskud@verizon.net or call Bruce Skud at 978 462 3905.

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NO MORE FUKUSHIMAS
STATEMENT ON WASTE CONFIDENCE RULE
October 18, 2013
Docket ID No. NRC-2012-0246

No More Fukushimas urges the Nuclear Regulatory Commission (NRC) to continue the moratorium on licensing and relicensing commercial nuclear power plants until safe and permanent high-level nuclear waste disposal is available (assuming a safe solution is attainable). In the meantime, for short- or interim-term storage, we urge the NRC to require immediate implementation of dry cask storage for adequately cooled spent fuel.

Permanent disposal of spent fuel: An intractable problem

The United States has searched for a way to dispose of spent fuel for over five decades. At this point, there are no specific nuclear waste storage proposals that would solve this problem in the foreseeable future. Even if a seemingly suitable storage scheme for high-level radioactive waste were conceived, it could take decades to plan and implement. The closing of the Yucca Mountain facility in Nevada in 2010 demonstrated that planned facilities may never open, even after billions have been spent on development.

Simply put, the safe disposal of nuclear plant waste is a problem that may never be solved. Putting aside the formidable technical challenges of locating a proper geologic site, governors and legislatures vigorously oppose siting a national waste repository in their states. The reason for their relentless opposition is that their constituents, including the business community, however open to nuclear power they might be, do not want a national nuclear waste repository in their own backyard under any circumstance.

A national waste repository would create new and complex safety problems for our nation. If a national waste repository opened it would result in tens of thousands of shipments of high-level radioactive spent fuel and other nuclear waste across the United States, raising the spectre of weather- or transport-related accidents or terrorism in the states through which the spent fuel travels. *If 10-mile emergency evacuation plans for areas surrounding all nuclear plants are required, shouldn't there be a similar requirement for areas surrounding the corridor across which the spent fuel would travel?* Is this increased threat to national security worth the cost or risk to public safety?

The National Environmental Policy Act requires consideration of all reasonably foreseeable environmental impacts of a proposed action from cradle to grave, yet in its Generic Environmental Impact Statement the NRC does not even consider the cost and risk of transporting and storing fuel (for any period of time, let alone forever) when making licensing and relicensing decisions. Given that cost (and risk), plus the cost of decommissioning, is nuclear power worth it, especially with the risk of terrorism?

At this juncture, the most logical and immediate way to begin to effectively address the spent fuel is problem is to limit the generation of new spent fuel by stopping the licensing and relicensing of nuclear plants. A moratorium would ultimately end production of spent fuel at all nuclear reactors as plant operating licenses lapse. Obviously, the US would still need to address spent fuel that has already accumulated as well as spent fuel that will be generated from licensed plants.

Dry cask storage: A necessity for short-term or interim storage of spent fuel

The short- or interim-term storage of spent fuel is an escalating public safety matter because the United States has failed to identify or build a permanent national spent fuel repository. At nuclear plants across the nation, short-term storage has become *defacto* long-term storage, and risky wet storage pools are filling beyond their design capacity. Any doubling up on design capacity exacerbates the potential for a radioactive release.

The NRC should require all nuclear power plants to move spent fuel into dry cask storage to minimize the risk to the public *immediately* after the spent fuel has cooled. Dry cask storage is inherently safer than wet storage of spent because it is air cooled. Wet storage depends on electrical generators to keep spent fuel cooled. Should generators fail and the ability to circulate cooling water be lost, the public would be put at serious risk.

Geologic or weather-related events could disable the electrical generation used for wet storage, possibly setting off fires and radioactive release. For example, at the Seabrook nuclear power plant, which stores most of its spent fuel in wet storage, a 4.0-level earthquake hit recently only 20 miles from the plant. The Seabrook plant has been identified as one of the most vulnerable nuclear power plants in the nation to flooding and storm surges (Stanford University researcher, 2012). Yet, the public has not been informed if the plant has taken steps to protect against interruption of electrical generation for wet storage as a result of flooding or earthquake.

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