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Consideration of Environmental Impacts on Temporary Storage of Spent Fuel After Cessation of Reactor Operation

Comment On: NRC-2012-0246-0362

Draft Waste Confidence Generic Environmental Impact Statement

Document: NRC-2012-0246-DRAFT-0608

Comment on FR Doc # 2013-21715

Submitter Information

Name: Jamie Tietjen

General Comment

I am very troubled by the NRC DWC GEIC statement's lack of agreement with, or even acknowledgement of, certain basic scientific facts and established theories, as well as other major mistakes. They include:

-> Assuming indefinite storage at reactors can continue literally forever without a loss of institutional control. No known human institution has endured for more than 2000 years. Plutonium-239 will remain hazardous for at least 240,000 years. Other fission byproducts have half-lives up to ten times longer than that of Plutonium.

-> Assuming that dry cask storage -- cask pads, inner canisters, and the dry casks themselves -- will be replaced once every 100 years, forevermore into the future. This goes beyond institutional control, to functional operations, knowledge, and resources. It also assumes that replacing dry cask storage casks will not have any real risk that the irradiated nuclear fuel will so degrade with age that such transfer operations cannot be carried out safely or smoothly.

-> Use of the Private Fuel Storage (PFS), LLC "centralized interim storage" proposal, targeted at the Skull Valley Goshutes Band of Indians in Utah, as a model for away-from-reactor storage. PFS was canceled in December 2012. NRC claims in its GEIS to observe Environmental Justice (EJ) principles, and yet PFS was a blatant violation of EJ. Nearly 500 organizations across the U.S. joined with Skull Valley Goshute traditionals urging NRC to disapprove PFS's license, due to its inherent violation of EJ.

-> Assuming that populations surrounding the on-site storage pools will be successfully evacuated during a storage pool fire, when the 10 mile radius emergency protection zones are likely to have been voided under the exemptions from regulations that occur as soon as 10 to 18 months after reactor shutdown.

-> Assuming that the worst-case storage pool accident would be a full pool drain-down, when a partial drain-down would actually accelerate the temperature rise of the the exposed fuel to its ignition point, as environmental coalition expert witness Dr. Gordon Thompson of the Institute for Resource and Security Studies (IRSS) has pointed out.

-> Largely ignoring on-site specific risks.

Measuring the risk of catastrophic failure of radioactive storage in cannot be done meaningfully in financial units. This type of measurement of this kind of outcome misses many of the detrimental and binding long term interrelated environmental problems that will continue to imperil our species and our planet for many millennia. When meaningful, the equivalent monetary value of of a single species' benefit to our ecosystem is often surprisingly large, such as that of the honeybee (for pollination) or the common brown bat (insect control).

It should become obvious to observers of the overall "big picture" that the inherent risks and rising costs of nuclear-generated power are more than reason enough to stop making nuclear waste, and immediately put our resources into enhancing efficiency and rapid development of renewable sources of energy.

It should also become obvious to observers that where high-level radioactive wastes already exist, Hardened On-Site Storage is the only immediately acceptable interim measure. This should be expedited as a top priority for our national security.

The breadth of these failures in this DWC GEIS suggest many questions about the NRC of its competency and corruption.