## Rulemaking1CEm Resource

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PR-51 Waste Confidence Subject:

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**COMMENT#: 00406** 

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# **PUBLIC SUBMISSION**

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**Docket:** NRC-2012-0246

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

Operation

**Comment On:** NRC-2012-0246-0456

Waste Confidence - Continued Storage of Spent Nuclear Fuel; Extension of Comment Period

**Document:** NRC-2012-0246-DRAFT-0871

Comment on FR Doc # 2013-26726

## **Submitter Information**

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## **General Comment**

Although no viable long term solutions are currently available, the highly radioactive fuel rods which have sufficiently cooled must be immediately transferred into more secure, hardened on site, dry cask storage. This process should be accelerated in anticipation of California's next big earthquake.

Making matters far worse, years ago the NRC quietly approved burning the fuel in the reactors longer, resulting in "high burnup" waste, which turns out may not actually be safe for storage or transport. High burnup fuel, and its excessive

thermal and radioactive heat accelerating the degradation of dry cask storage containers, has not been adequately addressed in the GEIS.

While the NRC has licensed the storage of "normal" radioactive fuel for up to 50 years, it can't endorse the storage of high burnup fuel for even 20 years. It is urgent for the NRC to look into best practices for each specific site and not

try to apply a convenient and unscientific solution to all nuclear power plants. Realistic options must be explored and implemented before time runs out. I strongly object to the seemingly arbitrary change in the NRC policy stating that it will

now be okay to leave the nuclear waste where it is, for however long it takes the federal government to create a permanent waste site. That is simply unacceptable.