

## Rulemaking1CEm Resource

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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-1161

Comment on FR Doc # 2013-26726

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## General Comment

With hindsight it is clear that the public was not informed of critical developments during the first few days and weeks of the Fukushima disaster. The public was harmed as a result. We should learn from this historical fact.

Not only was Tepco silent about what FOIA documents now reveal as 3 meltdowns in the early days of the Fukushima accident, but FOIA documents also reveal that a contingent of US nuclear engineers and scientists were active participants in the technical response to the 3 meltdowns, as they occurred.

For me it is clear that the development of the 3 meltdowns was well known to the US nuclear industry as the meltdowns occurred. And yet this situation was kept secret.

Regardless of why--whether it was considered a national security issue, or whether it was merely to prevent panic--the dire situation at Fukushima, and the likely creation of radioactive fallout, was kept secret.

As a result of the meltdowns, airborne radioactive Iodine-131 was beginning to circle the globe. But the public was not informed.

Pregnant women in the northern hemisphere should have taken steps to minimize their exposure. But they were not informed.

Sailors on the USS Reagan were exposed to high doses of radiation from the radioactive plumes. But they were not informed.

Regardless of why, We the People were not informed.

If we are looking for confidence in our nuclear waste management, then we should consider the above historical lesson as we plan our escape from the nuclear waste quagmire. We should do the right thing. We cannot allow a repeat of Fukushima on our own soil.

Each spent fuel pool can contain up to six times the mass of nuclear fuel as is stored in the reactor core itself. Spent fuel is much dirtier--much more radioactive--than new fuel. Any event that causes a single spent fuel pool to lose its integrity could result the release of a large portion that highly radioactive spent fuel into the environment, as airborne radioactive contamination similar to what was seen in Fukushima. With six times the fuel of an operating reactor core, it would release twice the contamination compared to the 3 Fukushima cores which became meltdowns. But because it is dirty spent fuel, it would be much worse. We simply cannot allow such a development. And most certainly, we cannot allow such a development to be kept secret. But if recent history is any indication, we cannot expect to be informed.

This new reality requires that we take action on three fronts:

1. Begin an emergency program to put spent fuel into dry cask storage.
2. End the madness of the overstocked spent fuel pools. The spent fuel pools should contain only the minimum inventory required for safe operation of the NPP, plus the inventory that is less than 5 years old and is too hot to remove. This should be made an operating requirement.
3. Require that the spent fuel pool situation begin improving immediately. Regulate the industry so that any refueling activity must result in a net improvement of the situation. Require that for each kilogram of new fuel delivered to the NPP site, 2 kilograms of spent fuel must be taken out of the spent fuel pool and put in dry cask storage.