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## Nuclear Information and Resource Service

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### Nuclear Information and Resource Service Comments on 10 CFR 50,72, and 170

Storage of Spent Fuel in NRC-Licensed Casks at  
Nuclear Power Reactor Sites  
(54 FR 86:19379, May 5, 1989)  
June 7, 1989

The Nuclear Information and Resource Service believes that the process currently required for license amendment to store irradiated fuel in dry casks at reactor sites, where generated, is necessary because it provides the opportunity for notification of and acknowledgement by the public of the new storage technology.

Dry cask storage could be preferential to wet storage for irradiated fuel at both operating and closed reactors.

Although critical of the continuing generation of nuclear waste, for which there is no safe final disposal, many citizens may support the choice of dry storage as compared to other options which have greater risks such as transportation, further reracking of the fuel pool and rod consolidation.

Generic approval of all reactors moving to dry cask storage without the opportunity for public comment currently available, is the wrong move for the NRC at this time. The public could raise concerns that are site-specific which would improve the safety of the dry storage option. Dry storage at reactors should be open to public discussion.

Our other, and perhaps even major, concern with the proposed rule is that it would permit transshipment to and from other reactors. Again, this decision should be made on a case by case basis with a goal of minimum transport and a prohibition on unnecessary transport. Each reactor could become an MRS (Monitored Retreivable Storage site) for other reactors' waste.

Thank you for consideration of these comments.

*dedicated to a sound non-nuclear energy policy.*

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