

WCO outreachCEM Resource

From: Leighton, Timothy [Timothy.Leighton@windstream.com]
Sent: Friday, February 24, 2012 1:38 PM
To: WCO outreach Resource
Subject: No Confidence in Nuclear Waste Confidence Decision

Nuclear Regulatory Commission:

I disagree with your proposal to allow on-site storage of nuclear waste in indoor pools and outdoor dry casks. These methods simply defer the burden of ultimately disposing of the waste to future generations, and in the meantime create a substantial environmental risk to our society.

Current on-site storage in outdoor dry casks is not safe, secure, or protective of human health or the environment. [As shown by a 1998 test performed at the U.S. Army's Aberdeen Proving Ground in Maryland](#), dry casks were not designed to withstand terrorist attacks. A TOW anti-tank missile blew a hole in the side of a cask, creating the pathway for a disastrous radioactivity release. In addition, [the structural integrity of dry casks is very questionable due to non-existent quality assurance and control](#), as revealed by industry and even NRC whistleblowers over the decades. In addition, [many incidents have already occurred with dry casks over the past 25 years](#), including the [near drops of heavy loads](#) during fuel transfer that risked draining pools of their cooling water. Over time, the thermal heat and radioactivity within dry casks, as well as the elements to which they are subjected outdoors, will degrade the concrete and/or steel of which they are made. They will begin to spring leaks, releasing radioactive particles and gases into the environment, unless they are replaced. But once nuclear power plants are decommissioned, there would be no safe location in which to carry out the transfer of irradiated fuel from old, degraded casks into new replacement ones. The replacement of old casks, and the building of new pools in which to carry out the transfers, will prove very expensive, but there is no other option.

As Beyond Nuclear board member Judith Johnsrud has long argued, the radioactive waste problem is "trans-solutional," a problem beyond our ability to solve. Nuclear power must be abolished. We must stop making radioactive waste in the first place. As shown by the ["Mountain of Radioactive Waste 70 Years High,"](#) prevention is the only real solution for radioactive waste.

Regards,

Tim Leighton

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