

WCO outreach CEm Resource

From: Kathe Garbrick [femme Katz@gmail.com]
Sent: Friday, February 24, 2012 2:20 PM
To: WCO outreach Resource
Subject: Spent Fuel Storage and Transportation

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.

The NRC's "confidence" that on-site storage for 120 years (60 during reactors operations, 60 after reactor shutdown) is safe and secure would be laughable, if it weren't so seriously wrong. 120 years is half as long as the United States has been an independent country (1776 to 2012, 236 years). A lot can go wrong in 120 years. NRC's consideration of 200 to 300 years of on-site storage is even more preposterous. This is not "interim" or "temporary" on-site storage.

This is de facto permanent on-site storage, in any common understanding of the term.

NRC should require Hardened On-Site Storage (HOSS) to safeguard high-level radioactive waste against accidents, secure it against attacks, and prevent leakage over time into the environment. HOSS would require fortifications and the highest quality assurance and control. Hundreds of environmental groups across the U.S. have endorsed HOSS.

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.

Thank you,
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Federal Register Notice: 99FR99992
Comment Number: 69

Mail Envelope Properties (CABa4Axw5d+wLgJcPdsJK7Xf8+XQVqtrFbnggHX1A5uiBOv9qZQ)

Subject: Spent Fuel Storage and Transportation
Sent Date: 2/24/2012 2:19:50 PM
Received Date: 2/24/2012 2:19:03 PM
From: Kathe Garbrick

Created By: femmekatz@gmail.com

Recipients:
"WCO outreach Resource" <WCO outreach.Resource@nrc.gov>
Tracking Status: None

Post Office: mail.gmail.com

Files	Size	Date & Time
MESSAGE	2763	2/24/2012 2:19:03 PM

Options
Priority: Standard
Return Notification: No
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Sensitivity: Normal
Expiration Date:
Recipients Received: