

WCO outreachCEm Resource

From: M. Wakefield [wakefieldm_2000@yahoo.com]
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Current on-site storage in indoor pools is not safe, secure, or protective of human health and the environment. [Fukushima Daiichi has shown](#) that pools can boil or drain dry, sparking a catastrophic radioactive fire, releasing up to 100% of the hazardous Cesium-137 in decades worth of the piled up irradiated nuclear fuel densely crammed into pools. [Several storage pools in the U.S. have simply sprung leaks over the decades](#), unleashing radioactively contaminated water into soil, groundwater, and surface water. [As documented in a report by Alvarez et al.](#), NRC commissioned studies themselves have admitted that a pool fire could cause around 25,000 latent cancer fatalities downwind (2001), or even 54,000 to 143,000 latent cancer fatalities downwind, 2,000 to 7,000 square kilometers [770 to 2,700 sq. miles] of agricultural land condemned, and economic costs due to evacuation of \$117 to 566 billion [\$158 to 765 billion in 2010 dollars, when adjusted for inflation] (1997).

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.

Thank you for your attention,

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