

WCO outreach CEm Resource

From: tsteorts@juno.com
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To: WCO outreach Resource
Subject: Nuclear Waste Confidence Decision

To: NRC

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.

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. 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.

Sincerely,
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