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Docket: NRC-2012-0246

Consideration of Environmental Impacts on Temporary Storage of Spent Fuel After Cessation of Reactor Operation

Comment On: NRC-2012-0246-0456

Waste Confidence - Continued Storage of Spent Nuclear Fuel; Extension of Comment Period

Document: NRC-2012-0246-DRAFT-1091

Comment on FR Doc # 2013-26726

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General Comment

Fukushima showed us that storing hot spent fuel in a fuel pool is inherently dangerous. If a pool drains, recently used fuel catches fire. Storing such fuel inside a nuclear plant makes any disaster more difficult to manage, as a reactor disaster may make it impossible for quite some time to continue to maintain a fuel pool, and vice versa.

Fuel should be moved to dry cask storage as soon as possible, and needs to be moved away from population centres and farm land. In fact it should be generated away from population centres and farm land in the first place, as it is very difficult to move when hot, which is when it is difficult to manage and potentially very dangerous.

In order to ensure private nuclear power suppliers and private handlers of spent nuclear fuel take safety seriously in their businesses, the government should not provide free insurance for accidents, or limit liability for private entities running waste producing nuclear facilities such as power plants, or to private entities storing nuclear waste. The increased costs of gaining private insurance, and the monitoring that comes with that will undoubtedly be greater motivation to take safety much more seriously than has been the case in the past. Three mile Island, Chernobyl and now Fukushima being the most public examples of how important every motivation to keep storage of waste , and facilities that generate that waste as safe as possible.

It is important to realise the crushing cost of generating or storing nuclear waste (spent fuel) in an unsafe manner. Here is a chilling real life example from the United Kingdom. When one of the Chernobyl Nuclear

Power Plant's reactors melted down more than 25 years ago the UK was seriously affected more than 1,300 miles away. Produce from 9,700 farms in the UK had to be quarantined and diverted as being unfit for human consumption. The UK is a continent away from Chernobyl. 25 years later, there were still more than 300 restricted farms in the UK, still too heavily contaminated with fall out to be allowed to sell their produce.

The consequences of a fuel pool fire in the event that a disaster drains a pool are just as serious as a meltdown. Once fuel catches fire the radiation release has the potential to make getting near enough to the fire to control it extremely hazardous, and with fuel pools typically stored near reactors, such an event obviously runs the risk of triggering other disasters, such as loss of cooling and control of a nuclear reactor.

The Fukushima disaster in Japan, Chernobyl in the Soviet Union and Three Mile Island in the USA have demonstrated very clearly that a technologically elite country with a strong government, like the USA can still have a disaster with stored radioactive waste (spent fuel) that literally may be so costly as to make the countries future uncertain, and ruin the health of literally millions of people.

Nuclear contamination of food is very serious, and storage of nuclear waste has to be as safe as possible. The consequences are so costly for a mistake with for example recently used nuclear fuel, that it is reasonable to spend vast sums of money to make it as safe as possible. If the private sector is unwilling to take the risk to store fuel safely without legislative insurance subsidies limiting their liability, then the government should take control of the rad waste problem. There should be no legal limits placed on liability with regard to storage accidents. To limit liability is to shield the private sector from a powerful motivating factor to get their storage up to a safe standard. The public deserve better than that.

The consequences at worst of a fuel pool fire would be similar to those seen at Chernobyl, Fukushima and Three Mile Island, with large areas of productive land ruined, and the health of those affected by resulting fallout from a fire destroyed. Note that Lithuania detected plutonium from Fukushima, the fallout from a serious disaster with a burning spent fuel pool would undoubtedly affect a huge area.

Summary

- Any operation that generates spent nuclear fuel should be located far from any productive farm land and far from any populated area to mitigate the damage done in event of loss of cooling to spent Nuclear fuel.
- Spent Nuclear fuel should be moved to dry cask storage as quickly as possible, spent fuel should not be stored where a fuel pool fire could affect people, farm land or even worse, a nuclear reactor anywhere near farm land or people.
- The private sector should have to provide unsubsidised private insurance to cover the costs of any disaster involving storage of spent nuclear fuel. This is vital if safety is to be taken as seriously as it should be. There should be no legislative limits on liability in event of an accident.