

From: Blaine N.Howard <blainehoward@yahoo.com>
To: <nrcprep@nrc.gov>
Date: Tue, Sep 12, 2000 3:41 PM
Subject: Draft Report Comments: NUREG-1714

65 FR 39206
June 23, 2000
122

Below is the result of your feedback form. It was submitted by
Blaine N.Howard (blainehoward@yahoo.com) on Tuesday, September 12, 2000 at 15:41:12

StreetNumber: 11203 South

StreetName: 1700 East

City: Sandy

State: Utah

ZIP: 84092-5162

Country: USA

Affiliation: Health Physics Society

Comments: I wish to commend the NRC staff for proceeding with a proper Environmental Impact Statement on the proposal of the Goshute Indians for the temporary storage of spent fuel from nuclear reactors in the face of an organized opposition from the political leaders of the State of Utah. I made oral comments at a hearing in Salt Lake City, but wish to make more detailed comments concerning this important project.

Just as a surgeon would not ask a truck driver for advice on how to perform a delicate operation, the Nuclear Regulatory Commission should consider the statements of politicians and others who, are not familiar with the concepts radiation and radioactivity, to be of equal validity with the statements of those who are experts in the field.

I started my career in health physics 1953 as an AEC Fellow in Radiological Physics at the University of Rochester with summer training at Brookhaven National Laboratory. I then was employed as a health physicist at the BNL research reactor until drafted into the US Army. Since that time, I have had many years of experience in the field of health physics including
Measurement of radiation doses from the detection limit to millions of rads.
Teaching radiation workers the basics of radiation safety.
Health physics supervision of reactor refueling operations
Health physics supervision of uranium mill tailings remedial action.

I have studied many reports concerning the biological effects of ionizing radiation and am aware of the non-threshold theory of radiation effects and its shortcomings. I am also aware of the claims of "radiation hormesis", (that radiation has beneficial effects).

I have also seen reports of the construction of the canisters which are used in the transport of high level radioactive wastes and spent fuel elements and feel I would be much safer driving on the freeways or highways next to a shipment of high level nuclear waste than next to a tanker filled with gasoline.

As a result of my studies, I have concluded that the effects to the population and any individual who may be exposed to the small amounts of radiation from the transfer and storage of the spent fuel elements would not only be so small as to be insignificant but are just as likely to be beneficial as they are to be harmful. Therefore, I can state conclusively that THERE IS NO JUSTIFICATION FOR

Template Adm013

ER105-03
Add Scott Flanders
(SCF)

OPPOSING THE SHIPMENT OR STORAGE OF SPENT NUCLEAR FUEL ON THE BASIS OF HEALTH EFFECTS.

I have also studied the energy needs of this nation and the resources for the production of this energy. We have, in the past, and are now relying heavily on foreign oil to meet our energy needs. This practice has a great impact on our NATIONAL SECURITY and we would have a much more stable and secure nation if we could produce a larger percentage of our energy requirements from domestic sources. NUCLEAR ENERGY RESOURCES are abundant in the United States and could be utilized to replace much (if not all) of that which is now supplied by foreign oil.

I feel that it is our duty as loyal citizens of the United States of America to do all that is within our power to assist in producing more of our energy needs from nuclear sources. One of the great problems facing the nuclear industry is the accumulation of spent nuclear fuel at the reactor sites. The BEST SOLUTION to this problem would be RECYCLING of the spent fuel, which still contains over 90% of its original energy content, and putting the fuel back into the reactors. This would still leave high level radioactive waste to dispose of but with a MUCH SHORTER HALF LIFE OF ONLY 30 YEARS. This solution is not available to us now because of a political decision made by the "leaders" of our nation many years ago BUT THAT DECISION SHOULD BE REVERSED.

In the meantime, we need to sold the problem with TEMPORARY STORAGE of the spent nuclear fuel. The Goshutes have been brave enough to volunteer to accept and store this spent nuclear fuel over the protests of some of the most vocal political leaders of the state of Utah and are to be commended for this. Governor Leavitt has made the statement that the waste would be allowed to come here "over my dead body". Such irrational statements should never be made by a public leader who obviously has either not studied the issues objectively or has chosen to defy the true needs of the public because of some selfish political agenda. I wrote the governor a letter in 1998 to tell him that he had been mislead by his advisors and offering to give him any information I could to help him understand the issues but he didn't even acknowledge my letter. On March 3, 1999, an editorial appeared in the Deseret News entitled "KEEP WAGING NUCLEAR WASTE BATTLE". I am enclosing a copy of my answer to this editorial.

There is a great need for public education about the issues involved in this project and the NRC needs to weigh the comments from those who have expertise in the field of ionizing radiation more than those from those who have no knowledge of what is involved.

Sincerely,
Blaine N. Howard, Health Physicist (retired)
11203 South 1700 East
Sandy, Utah 84092

To the Editor
Deseret News

Dear editor:

I was disturbed by your editorial entitled "Keep waging nuke waste battle" in the Wednesday, March 3, 1999 Deseret News in the column "IN OUR OPINION". The position which Governor Leavitt has taken on the proposed temporary storage facility on the Goshute Indian Reservation is purely a political position and can not be justified on the basis of health and safety considerations. He is spending taxpayer money to fight an unjustifiable battle.

Let me make it clear that I have no connection with Private Fuel Storage. I am currently retired after serving for 18 years in Radiation Control programs for the State of Utah and 6 years with Envirocare of Utah. I began my study of Radiological Physics in 1953 as an Atomic Energy Commission Fellow at the University of Rochester and received an M.S. in this field from New York University. I have been certified by the American Board of Health Physics although my certification is not current. I feel that I

am qualified to make the judgements which am expressing in this letter.

The anti-nuclear activists have succeeded in selling the politicians, the media and much of the public on the concept that the waste is so dangerous that the common viewpoint is "not in my back yard" or "not in my state". But that does not make it true.

I would like to make you aware of an organization called the Health Physics Society? This is a society devoted to the purpose of protecting people and the environment from the harmful effects of radiation. The 1997-1998 Directory of the Health Physics Society lists 34 members in Utah with 20 members in Salt Lake City. If you want to get a professional viewpoint about the hazards of such a facility, I suggest you poll these members. I am one of these members and am disturbed at the viewpoint expressed by our governor and legislature. That viewpoint reflects an obvious misunderstanding of the issues involved.

Let me summarize the basic points involved.

1. Nuclear reactors, when properly designed, constructed and operated, are safer and cleaner sources of electricity than power plants using coal. A coal fired plant releases more radioactivity to the environment than a comparable nuclear plant. The volume of waste from a coal fired plant is hundreds of times that from a nuclear plant.

2. Oil, gas, and fossil fuel plants release oxides into the atmosphere which produce acid rain. Nuclear plants do not.

3. The fuel for nuclear power plants is available in the United States and every nuclear plant we operate reduces our dependence upon foreign oil.

4. One of the major problems for the nuclear power industry is the proper disposal of the waste which is generated.

5. The spent fuel rods from reactors are really not waste since they still contain greater than 90% of the inherent energy which could be utilized by a complete nuclear program.

6. To place the spent fuel in a permanent disposal facility and deny future access to this source of energy would be a gross misuse of our natural resources.

7. Utilization of a TEMPORARY storage facility until our politicians can be educated about the basic facts of nuclear energy would leave this potential source of energy available for future use.

8. By joining the rest of the radiation hazard illiterate states in the philosophy of "not in my back yard", Utah is helping to close the door on nuclear power. I believe this is an unjustified position which fully informed Utah citizens would not want to take.

9. The transportation and storage problems have been fully addressed and approved by responsible agencies of the federal government including the Nuclear Regulatory Commission and the Environmental Protection Agency. The risks to the public from these operations are not sufficient to justify opposing the operation.

Whatever the real reason for the governor's opposition to the proposed facility, it is wrong when viewed from a true understanding of the principles involved and Utahns should not support him in a wrong position.

I am appalled that the Deseret News suggests that unorthodox measures are justified and that whatever legal means are at the governor's disposal should be used to prevent the spent fuel from being shipped to Utah. I am willing to spend some time and effort to help the editorial staff of the Deseret News to understand the facts relative to this subject.

Sincerely,

Blaine N. Howard, Health Physicist
11203 South 1700 East
Sandy, Utah 84092
Phone 801-571-2245

Submit2: Submit comments

Mail Envelope Properties (39BE86F3.B10 : 13 : 27408)

Subject: Draft Report Comments: NUREG-1714
Creation Date: Tue, Sep 12, 2000 3:41 PM
From: Blaine N.Howard <blainehoward@yahoo.com>

Created By: GWIA:blainehoward

Recipients

Post Office TWFN_DO.twf2_po
NRCREP

Domain.Post Office

TWFN_DO.twf2_po

Route

TWFN_DO.twf2_po

Files

MESSAGE
Header

Size

10504
556

Date & Time

Tuesday, September 12, 2000 3:41 PM

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard