

PRM-51-10
(71FR64169)

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From: "Barbara Hildt" <barbara.hildt@verizon.net>
To: <SECY@nrc.gov>
Date: Fri, Mar 2, 2007 9:09 AM
Subject: A.G.'s petition to NRC

DOCKETED
USNRC

March 5, 2007 (3:15pm)

Secretary,

U.S. Nuclear Regulatory Commission,

Washington, DC 20555-0001

Attn: Rulemakings and Adjudications Staff.

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

RE: Docket No. PRM-51-10 - Support The Massachusetts Attorney General's
Petition for Rulemaking- Spent Fuel

I strongly support the Massachusetts Attorney General's Petition for
Rulemaking in its entirety.

Specifically I support the conclusions that, the Nuclear Regulatory
Commission should:

(a) Consider new and significant information showing that the NRC's
characterization of the environmental impacts of spent fuel storage as
insignificant in the License Renewal GEIS is incorrect,

(b) Revoke the regulations which codify that incorrect conclusion and excuse
consideration of spent fuel storage impacts in NEPA decision-making
documents,

(c) Issue a generic determination that the environmental impacts of
high-density pool storage of spent fuel are significant, and

(d) Order that any NRC licensing decision that approves high-density pool
storage of spent fuel at a nuclear power plant or any other facility must be
accompanied by an EIS that addresses (i) the environmental impacts of
high-density pool storage of spent fuel at that nuclear plant and (ii) a
reasonable array of alternatives for avoiding or mitigating those impacts.

We know that this rule change is important to better protect our public
health and safety. For example, simply look at the estimates of costs and
latent cancers following the releases of Cesium-137 from Pilgrim's spent
fuel pool prepared by Dr. Jan Beyea for the Massachusetts Attorney General
Motion to Intervene in the Re-licensing Application for Pilgrim and Vermont
Yankee, May 25, 2006.

Estimates of Costs and Latent Cancers Following Releases of Cesium-137 from
Pilgrim's Spent-Fuel Pool

Template = SECY-067

SECY-02

Consequence

10% release C-137

100% release C-137

Cost (billions)

\$105-\$175 billion

\$342-\$488 Billion

Latent Cancers

8,000

24,000

Sincerely,

Barbara Hildt

19 Acadia Kimball Rd.

Amesbury, MA 01913

CC: <Matthew.Brock@ago.state.ma.us>

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From: "Barbara Hildt" <barbara.hildt@verizon.net>

Created By: barbara.hildt@verizon.net

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ago.state.ma.us

Matthew.Brock CC

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