

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Monday, December 16, 2013 4:01 PM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: Docket ID No. NRC-2012-0246

**DOCKETED BY USNRC—OFFICE OF THE SECRETARY  
SECY-067**

**PR#:** PR-51

**FRN#:** 78FR56775

**NRC DOCKET#:** NRC-2012-0246

**SECY DOCKET DATE:** 12/13/13

**TITLE:** Waste Confidence—Continued Storage of Spent Nuclear Fuel

**COMMENT#:** 00416

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**From:** Gene Stone [<mailto:genston@sbcglobal.net>]  
**Sent:** Friday, December 13, 2013 7:50 PM  
**To:** RulemakingComments Resource  
**Subject:** Docket ID No. NRC-2012-0246

**Residents Organized For a Safe Environment (ROSE)** AND MANY CALIFORNIANS, OBJECTS TO THE GENERIC ENVIRONMENTAL IMPACT STATEMENT FROM THE NUCLEAR REGULATORY COMMISSION CONCLUDING THAT NUCLEAR WASTE CAN BE STORED AT SAN ONOFRE INDEFINITELY. OUR PEOPLE SEEK A MORE ACTIVE ROLE IN THE DECOMMISSIONING OF THE SAN ONOFRE NUCLEAR GENERATING STATION (SONGS). WITH SO MUCH EXPOSURE TO DANGER OVER THE FORESEEABLE FUTURE, IT IS ENCUMBENT ON US TO ACT RESPONSIBLY AND OPPOSE THIS GENERIC PLAN.

The Nuclear Regulatory Commission (NRC), in their Generic Environmental Impact Statement (GEIS), has expressed confidence in storing nuclear waste at SONGS for however many decades, or even centuries, it takes before a permanent waste disposal site becomes available.

The confidence of the NRC in the safety of indefinite on site storage is based on generic assumptions about all nuclear power plants and not the particular circumstances of San Onofre, which is in an area susceptible to earthquakes and tsunamis situated adjacent to the primary transportation corridor and military compound/terrorist target.

The GEIS only considers the environmental impacts when everything goes as planned, but it does not weigh the consequences of various alternative solutions should things fail to go as planned.

The NRC has not been able to approve any kind of transportation canister for radioactive high burnup fuel due to concerns the protective cladding may fail, resulting in possible radiation releases.

The NRC has not been able to approve a dry cask storage system that can last for more than 20 years due to the much hotter, more radioactive high burnup fuel even though the fuel must be stored for thousands of years.

The NRC has not completed research on extended used fuel storage prior to completion of the GEIS.

The nuclear industry has no technology to determine what the conditions are inside dry storage casks.

The NRC has determined that it is no longer necessary to have permanent inspectors on site during the decommissioning process.

The quantity of radioactive materials stored on site is nearly 90 times that released by the Chernobyl accident.

Approximately 75% of the nuclear waste is currently being stored in pools which are vulnerable to natural disasters, terrorist attack or human error.

The dangers to our community posed by storing nuclear waste here indefinitely requires us to become more involved in the decommissioning process. There are steps that could and should be taken to reduce the risk to our community by taking highly radioactive waste from vulnerable pools and move into fortified dry cask storage containers as soon as fuel rods are cool enough to be transferred; and/or by expediting storage and transport solutions for high burn up fuel. We will strongly oppose becoming a permanent nuclear waste site by default, simply because other solutions have failed to materialize or have not been fully explored. With this Resolution, ROSE does formally object to the NRC's incomplete GEIS and seeks to become more actively involved in discussions leading to the best outcome possible concerning this very real and immeasurable threat to ourselves and neighboring communities. It is our fiduciary responsibility to do so on behalf of the citizens.

Sincerely,

**Gene Stone**  
**Residents Organized For a Safe Environment (ROSE)**  
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**“The environment isn’t over here. The environment isn’t over there. You are the environment.” Chief Oren Lyons Faithkeeper Turtle Clan of the Seneca Nations of the Iroquois Confederacy.**

**Hearing Identifier:** Secy\_RuleMaking\_comments\_Public  
**Email Number:** 438

**Mail Envelope Properties** (377CB97DD54F0F4FAAC7E9FD88BCA6D0014433AE3DB6)

**Subject:** FW: Docket ID No. NRC-2012-0246  
**Sent Date:** 12/16/2013 4:01:19 PM  
**Received Date:** 12/16/2013 4:01:21 PM  
**From:** RulemakingComments Resource

**Created By:** RulemakingComments.Resource@nrc.gov

**Recipients:**  
"Rulemaking1CEm Resource" <Rulemaking1CEm.Resource@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	4254	12/16/2013 4:01:21 PM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**