

WCRM-GEIS4CEm Resource

From: Sydney Vilen [dharmasyd@yahoo.com]
Sent: Friday, November 22, 2013 11:06 PM
To: RulemakingComments Resource
Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

The NRC's "waste confidence" principle was properly struck down by a federal court because, some 60 years into the commercial atomic age, it is patently obvious that there is no foreseeable "solution" for long-term radioactive waste storage that would attain three necessary and basic goals: scientifically-defensible, environmentally-responsible and publicly-acceptable.

*****My personal comment: Please read.

Sixty years ago, while an undergrad at UCB, I waited table at the Claremont Hotel, where the AEC members had their conferences. As the Quakers were sending asparagus to Eisenhower and the AEC was issuing press release statements that everything was safe to eat, I was the waitress for the head table where I watched Glenn Seaborg, Ed Teller, and other dignitaries push all dairy and veggies away. In my early twenties, this was my first lesson in authoritarian duplicity.

By congressional legislation, the AEC changed its name to the NRC in 1974, in hopes of moving away from a poor reputation due to its lies and obscurations.

I have hoped all my life that things would change, but Fukushima has demonstrated that there is still no honesty on the part of the overseers. Please prove me wrong. Please reverse this dishonesty, and be honest about the hazards of the god-like power of nuclear fission. Having taken these awesome powers into our hands, it is mandated that we must evolve a higher, more god-like consciousness. As Einstein referred, "We must change our mode of thinking." You can do that now!

*****End of personal statement. TY for reading.

Not only is there no long-term solution for atomic waste in hand or on the horizon, the shorter-term programs now in place are inadequate from a public safety standpoint, and do not offer the requisite confidence to allow continued generation of radioactive waste.

Nothing in the NRC's Draft NUREG-2157 changes these realities.

It is apparent that rather than undertake a thoughtful re-examination of the NRC's radioactive waste policies and priorities--which admittedly might have taken considerable time and effort, the NRC chose to hurriedly slap together a document whose only purpose is to provide a thin veneer of a cover to overturn the agency's forced moratorium on reactor licensing and renewal procedures.

The NRC is surely the only regulatory body in the world that would argue that indefinite--essentially permanent--storage of high-level radioactive waste in fuel pools and dry casks provides "confidence" that this waste will never cause a threat to public health and safety. By their very nature, neither casks nor fuel pools are designed for permanent storage.

Rather than insist on a robust waste management system intentionally designed to handle conceivable accidents whether through equipment failure, natural disasters, operator error or any other cause that could release radioactive materials to the environment, the NRC's draft

document ultimately relies on the low probability of an accident to justify its position that reactor licensing and relicensing may resume.

Low probability is not a substitute for protection, as the world already has learned from Fukushima to Chernobyl to Bhopal and Love Canal.

Ending radioactive waste generation is the single most important step we can take to minimize the risks surrounding its storage, and the NRC should revise its Waste "Confidence" document to ensure the speediest possible end to that generation. In the interim, NRC must mandate the immediate movement of waste that has been sufficiently cooled out of the pools to dry storage containers, and those should be hardened on-site (HOSS) to improve safety and security.

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CA

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