

WCRM-GEIS4CEm Resource

From: Sid Greene [sidido@sonic.net]
Sent: Friday, November 22, 2013 12:22 AM
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.

Most people do not understand how insidious, how toxic, and how long-lasting nuclear waste is. When I studied this in the 80s, I had been digesting the information for about two weeks when I cried for three days--at the end, realizing I was crying because of the hopelessness of the situation. No nuclear waste is safe. In cement? It weeps, and eventually breaks down, like the 55-gallon drums dumped off the Northern California Coast by President Reagan. Now? We have so much more reason to doubt our ability now and especially in the future to contain the hundreds of thousands of additional pounds of radioactive toxins we produce every year, because we are approaching the chaotic edge of the climate change our overuse of carbon-emission fuels and bombs has created, but this change will exacerbate. We can no longer afford at any price to continue to pollute the biosphere every single mammal on the planet needs to live, including any human descendants--we need to start tending our own nest rather than lining the nests of corporations bent on profit over human wellbeing, and possibly, over survival of the species.

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.

The public is neither warned of the dangers nor informed about how to protect ourselves. If there is much of a future for humans, gold will be valued merely on its ability to protect from radiation.

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.

Sid Greene

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