

WCRM-GEIS4CEm Resource

From: Brian Ritter [briannirs@johnhritter.com]
Sent: Wednesday, November 20, 2013 6:28 PM
To: RulemakingComments Resource
Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

The "low-probability" accidents at Chernobyl and Fukushima proved that it is too dangerous to continue in the false belief that "low probability" equals "no possibility". Mathematically, low-probability events do and always will happen given enough time; there is no escaping them. In the 60-year history of nuclear power generation, catastrophic low-probability accidents have occurred at least twice--both times killing many people (quickly and slowly) and turning large tracts of once-thriving land into uninhabitable dead zones.

I live near a nuclear generating station that stores radioactive waste indefinitely. It is not safe. I worry that I will be killed or that my home will be made unusable and I will be forced to become a nuclear refugee. I may not live long enough to see that happen, but it will happen.

For the last few decades we Americans have been trying to find a permanent solution to creating a safe way to permanently store radioactive waste. We have been unable to agree on a solution, and it seems likely that there is no safe solution, just solutions with "low-probability risk".

With the knowledge of the fact that eventually all low-probability events will happen at some point in time (and has already catastrophically occurred at least twice in regards to nuclear power generators), it would be foolish to continue to create radioactive waste that cannot be stored permanently and safely. Additional waste means additional risk. The NRC has the duty to protect us. We cannot go back in time and eliminate the creation of current waste, but we can set a course to stop creating it and thereby stop increasing the danger.

Until there is a permanent and safe solution that we can agree on, I am urging a permanent moratorium on any new waste production and an orderly shut down to the nuclear plants currently active.

I am also joining in agreement with the following statements also being submitted by fellow Americans.

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.

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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Federal Register Notice: 78FR56775
Comment Number: 9226

Mail Envelope Properties (1929766141.32786.1384990075621.JavaMail.tomcat)

Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence
Generic Environmental Impact Statement
Sent Date: 11/20/2013 6:27:55 PM
Received Date: 11/20/2013 6:27:56 PM
From: Brian Ritter

Created By: briannirs@johnhritter.com

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

Post Office: vweb70.salsalabs.net

Files	Size	Date & Time
MESSAGE	4494	11/20/2013 6:27:56 PM

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