

WCRM-GEIS4CEm Resource

From: Jim Diamond [jimdiamond@comcast.net]
Sent: Wednesday, November 20, 2013 4:42 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.

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.

While on-site fuel ponds are clearly the more dangerous choice and dry cask storage would be incrementally preferable, neither provides adequate assurance of acceptable risk to public health and safety, and neither is designed for permanence.

In addition to all conceivable and not-yet-conceived-of accidents, intentional sabotage must also be taken into account. Intentional damage intended to spread radiation is a potential terrorist agenda and may as likely or more likely than accident. Dispersed storage presents a multiplicity of potential targets.

Ending radioactive waste generation is important to minimize these societal risks. 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. All waste should be managed with an eye to security against both accident and intention.

We as a society should also think of the bigger picture. Alternative to nuclear energy are cheaper and safer.

Thank you for attention to my views, which I hope can nudge policy toward safer alternatives.

Jim Diamond

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