

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Tuesday, December 17, 2013 11:57 AM
To: Rulemaking1CEm Resource
Subject: FW: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

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TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel
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-----Original Message-----

From: Dee Butler [<mailto:revy@shaw.ca>]
Sent: Saturday, November 23, 2013 2:55 AM
To: RulemakingComments Resource
Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

TODAY, ONE OF THE TOXIC WASTE POOLS LOST A LEVY ON ONE SIDE AND EMPTIES MANY MILLIONS OF GALLONS OF HIGHLY TOXIC WASTE INTO THE ATHEABASKA RIVER IN ALBERTA. THIS WAS FROM A COAL MINE. IMAGINE IF IT HAD BEEN THE TYPE OF TOXINS THAT ARE USED IN BREAKING DOWN THE TAR SANDS AND/OR FRACKING. ALREADY THE LARGE RIVERS IN ALBERTA ARE AT A SERIOUS POINT AND CANNOT BE USED TO DRINK OR WATER CATTLE. THE FISH ARE DYING AND THE RIVERS ARE BECOMING 'DEAD ZONES'. AND THE PEOPLE IN THE REGION AND ESPECIALLY THOSE WHO LIVE ALONG THE VERY LONG RIVERS WHERE THE KEYSTONE/KEARL PROJECTS ARE SPILLING THEIR TOXIC WASTES, ARE HAVING WHOLE FAMILIES SICK AND DYING FROM LIVER CANCERS, THROAT CANCERS, NOT TO MENTION THE INFANTS AND CHILDREN WHO ARE USED TO SWIMMING IN THESE ONCE PRISTINE WATERS BUT MUST NOT DO SO AGAIN. WE NEED SCIENTISTS AS A PART OF ANY AGREEMENT THAT HITS A TABLE WHERE IT COMES TO THE NATION'S HEALTH. NO JUNK SCIENTISTS PAID FOR BY THE KOCH BROTHERS OR SOME REPUBLICAN FLUNKY LIKE DARYL ISSA.

THE PUBLIC HAS A RIGHT TO THE BEST INFORMATION IT CAN GET AND IT'S OBVIOUS THAT FEW IF ANY MEDIA OUTLETS ARE CAPABLE OF FOLLOWING ANYTHING THIS IMPORTANT. SO IT IS UP TO OUR GOVERNMENT TO SEE TO IT THAT ALL INCIDENTS ARE LOOKED AT WITH A LEVEL HEAD AND A SCIENTIFIC EYE. THAT THERE BE TOUGH REGULATIONS ON ANY TYPE OF ENERGY AND THAT A YEARLY FOLLOW UP ON SUCH ENERGY PROJECTS AND ALL NEW ONES BE DONE AND THEN HIGHLY PUBLICIZED. THAT IS SIMPLY NOT TOO MUCH TO ASK.

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.

Dee Butler

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