

## WCRM-GEIS4CEm Resource

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**From:** Patricia Berg [rivercrittergreen@yahoo.com]  
**Sent:** Friday, November 22, 2013 11:27 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.

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 re-licensing 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.

In North St. Louis County right now there is old World War II nuclear waste stored in a landfill that is an increasing risk to surrounding residents because of the negligence of any agency to have figured it out at all; and some of you may have been in the area within the past year, as I recall. Please check this story out:

<http://www.ksdk.com/story/news/local/2013/11/22/nuclear-expert-robert-alvarez-west-lake-landfill/3672211/>

And my friend Ed Smith of Coalition for the Environment:

<http://www.ustream.tv/recorded/40985039>

Personally I hope that all government agencies get over nuclear power as a potential good source of power or weaponry forever. The Calloway County Reactor also had an incident that a friend lent me information about some years back. Most of the stories are just subverted out of news media "for eternity" rather than admitting the facts publicly.

Patricia Berg

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**Federal Register Notice:** 78FR56775  
**Comment Number:** 9237

**Mail Envelope Properties** (1542496458.78254.1385180848553.JavaMail.tomcat)

**Subject:** Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence  
Generic Environmental Impact Statement  
**Sent Date:** 11/22/2013 11:27:28 PM  
**Received Date:** 11/22/2013 11:27:29 PM  
**From:** Patricia Berg

**Created By:** rivercrittergreen@yahoo.com

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

**Post Office:** vweb200.salsalabs.net

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3415	11/22/2013 11:27:29 PM

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