

Rulemaking1CEm Resource

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

From: Vivi Justesen [<mailto:evyjust@gmail.com>]
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To: Rulemakings and Adjudications Staff

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The U.S. Court of Appeals rejected the current Waste Confidence Rule noting that, after decades of failure to site a repository, the NRC has no long-term plan other than hoping for a geologic repository. It is hence possible that the highly radioactive spent fuel will be stored at reactor sites on a permanent basis.

The NRC must examine the environmental consequences of storing radioactive waste at reactor sites into the indefinite future.

The NRC Draft Generic Environmental Impact Statement relies on the assumption that all reactor sites are alike. This flawed assumption makes one wonder how reliable the other parts of the GEIS are. Each site has unique geographical, environmental, geological, and epidemiological considerations. To wit, Diablo Canyon Power Plant on the central coast of California sits on many earthquake faults, a condition no other nuclear plant in the US faces.

The creation of a one-size-fits all plan is scientifically invalid.

The statement by the GEIS Draft that long term - or indefinite - storage has little environmental impact completely disregards the extreme hazards of radioactive wastes and the complete lack of experience of storing these toxins. Countries like Finland face this very dangerous problem by creating underground storage carved out of solid rock. The Draft tells us that impact of a severe accident would be small. Based on what empirical evidence? Other nuclear powered nations seem to have information - and caution - very differently from the NRC.

The US Dpt Of Homeland Security labeled nuclear power plants potential terrorist targets. Having the highly radioactive "waste" stored in relative unprotected dry cask storage containers as well as the cooling pools not being protected by cement domes as the reactors are, leaves one with complete no confidence in the task the GEIS has attempted to fulfill.

Start all over again by addressing each nuclear power plant as a separate identity each with its own unique problems.

Start by not whitewashing the "relative safety" of highly radio waste.

Start all over again by considering the communities that are vulnerable to the dangers of this waste.

Start by taking us and this problem seriously.

Thank you.

Evy Justesen

San Luis Obispo, California

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