

Rulemaking1CEM Resource

From: RulemakingComments Resource
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To: Rulemaking1CEM Resource
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TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel

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From: Lewis Patrie [mailto:patrie.wncpsr@main.nc.us]
Sent: Wednesday, December 18, 2013 10:01 PM
To: RulemakingComments Resource
Subject: Docket ID No. NRC–2012–0246 - Waste Confidence DGEIS and proposed rule

To:
Secretary
U.S. Nuclear Regulatory Commission
regarding Docket ID No. NRC–2012–0246

Greetings:

Regarding the above subject, I support the Nuclear Information and Resource services recommendations, and ask have they been incorporated into the DGEIS proceedings?

They are as follows:

Principles for Safeguarding Nuclear Waste at Reactors

The following principles are based on the urgent need to protect the public from the threats posed by the current vulnerable storage of commercial irradiated fuel. The United States does not currently have a national policy for the permanent storage of high-level nuclear waste. The Obama administration has determined that the Yucca Mountain site, which has been mired in bad science and mismanagement, is not an option for geologic storage of nuclear waste. Unfortunately, reprocessing proponents have used this opportunity to promote reprocessing as the solution for managing our nuclear waste. Contrary to their claims, however, reprocessing is extremely expensive, highly polluting, and a proliferation threat, and will actually complicate the management of irradiated fuel. Nor will reprocessing obviate the need for, or “save space” in, a geologic repository. The United States has a unique opportunity to re-evaluate our nuclear waste management plan. We can make wise decisions about safeguarding radioactive waste or go down the risky, costly, and proliferation prone path towards reprocessing.

The undersigned organizations’ support for improving the protection of radioactive waste stored at reactor sites is a matter of security and is in no way an indication that we support nuclear power and the generation of more nuclear waste.

☞ **Require a low-density, open-frame layout for fuel pools:** Fuel pools were originally designed for temporary storage of a limited number of irradiated fuel assemblies in a low density, open frame configuration. As the amount of waste generated has increased beyond the designed capacity, the pools have been reorganized so that the concentration of fuel in the pools is nearly the same as that in operating reactor cores. If water is lost from a densely packed pool as the result of an attack or an accident, cooling by ambient air would likely be insufficient to prevent a fire, resulting in the release of large quantities of radioactivity to the environment. A low density, open-frame arrangement within fuel pools could allow enough air circulation to keep the fuel from catching fire. In order to achieve and maintain this arrangement within the pools, irradiated fuel must be transferred from the pools to dry storage within five years of being discharged from the reactor.

☞ **Establish hardened on-site storage (HOSS):** Irradiated fuel must be stored as safely as possible as close to the site of generation as possible. Waste moved from fuel pools must be safeguarded in hardened, on-site storage (HOSS) facilities. Transporting waste to interim away-from-reactor

storage should not be done unless the reactor site is unsuitable for a HOSS facility and the move increases the safety and security of the waste. HOSS facilities

must not be regarded as a permanent waste solution, and thus should not be constructed deep underground. The waste must be retrievable, and real-time radiation and heat monitoring at the HOSS facility must be implemented for early detection of radiation releases and overheating. The overall objective of HOSS should be that the amount of releases projected in even severe attacks should be low enough that the storage system would be unattractive as a terrorist target. Design criteria that would correspond to the overall objective must include:

Resistance to severe attacks, such as a direct hit by high-explosive or deeply penetrating weapons and munitions or a direct hit by a large aircraft loaded with fuel or a small aircraft loaded with fuel and/or explosives, without major releases.

Placement of individual canisters that makes detection difficult from outside the site boundary.

Protect fuel pools: Irradiated fuel must be kept in pools for several years before it can be stored in a dry facility. The pools must be protected to withstand an attack by air, land, or water from a force at least equal in size and coordination to the 9/11 attacks. The security improvements must be approved by a panel of experts independent of the nuclear industry and the Nuclear Regulatory Commission.

Require periodic review of HOSS facilities and fuel pools: An annual report consisting of the review of each HOSS facility and fuel pool should be prepared with meaningful participation from public stakeholders, regulators, and utility managers at each site. The report must be made publicly available and may include recommendations for actions to be taken.

Dedicate funding to local and state governments to independently monitor the sites: Funding for monitoring the HOSS facilities at each site must be provided to affected local and state governments. The affected public must have the right to fully participate.

Prohibit reprocessing: The reprocessing of irradiated fuel has not solved the nuclear waste problem in any country, and actually exacerbates it by creating numerous additional waste streams that must be managed. In addition to being expensive and polluting, reprocessing also increases nuclear weapons proliferation threats.

National

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John Issacs, Council for a Liveable World Kevin Kamps, Beyond Nuclear Lynn Thorp, Clean Water Action Erich Pica, Friends of the Earth

Michele Boyd, Physicians for Social Responsibility

Jim Riccio, Greenpeace

Diane Kreiger, Nuclear Peace Age Foundation

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Susan Gordon, Alliance for Nuclear Accountability

Arjun Makhijani, Institute for Energy and Environmental Research

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Anna Aurilio, Environment America

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Dan Becker, Safe Climate Campaign

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Russell Lowes, SafeEnergyAnalyst.org

Barbara Warren, Arizona Physicians for Social Responsibility

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Betty Winholz, SAVE THE PARK

Jacqueline Cabasso, Western States Legal Foundation

Molly Johnson, Grandmothers for Peace-San Luis Obispo County Chapter

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Jennifer Olarana Viereck, Healing Ourselves and Mother Earth

Dan Hirsch, Committee to Bridge the Gap

Pamela Meidell, Atomic Mirror

Colorado

Bob Kinsey, Colorado Coalition for the Prevention of Nuclear War

Sharyn Cunningham, Colorado Citizens Against Toxic Waste, Inc.

Judith Mohling, Rocky Mountain Peace and Justice Center

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Nancy Burton, Connecticut Coalition Against Millstone
 Judi Friedman, People's Action for Clean Energy
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 Louis Clark, Government Accountability Project
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 Bob Krasowski, Florida Alliance for A Clean Environment, The Zero Waste Collier County Group
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 Tom Ferguson, Foundatoin for A Global Community
 Bobbie Paul, Georgia WAND
 Glenn Carroll, Nuclear Watch South
 Bob Darby, Food Not Bombs, Atlanta
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 Maureen McCue, PSR Iowa
Idaho
 Beatrice Brailsford, Snake River Alliance
 Chuck Broschious, Environmental Defense Institute
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 Dave Kraft, Nuclear Energy Information Service
 Carolyn Treadway, No New Nukes
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 Grant Smith, Citizens Action Coalition of Indiana
 John Blair, ValleyWatch, Inc.
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 Johanna Neumann, Maryland PIRG
 Max Obuszewski, Baltimore Nonviolence Center
 Lucy Duff, Peace and Justice Coalition-Prince George's County
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 Bruce Gagnon, Global Network Against Weapons & Nuclear Power in Space
Michigan
 Keith Gunter, Citizens Resistance at Fermi Two
 Michael Keegan, Coalition for a Nuclear Free Great Lakes
 Georgia Donovan, Izaak Walton League-Dwight Lydell Chapter
 Terry Miller, Lone Tree Council
 Patricia Gillis, Voices for Earth Justice
 Alice Hirt, Don't Waste Michigan
 Nancy Seubert, IHM Justice, Peace, and Sustainability Office
 Lynn Howard Ehrle, International Science Oversight Board-Organic Consumers Association
 Kay Cumbow, Citizens for Alternatives to Chemical Contamination
 Ronald and Joyce Mason, Swords Into Plowshares Peace Center and Gallery
 David Gard, Michigan Environmental Council
 Steve Senesi, Kalamazoo Non-Violent Opponents of War
Minnesota
 Danene Provencher, West Metro Global Warming Action Group, Inc.
 Glady Schmitz, Mankato Area Environmentalists
 George Crocker, North American Water Office Bruce Drew, Prairie Island Coalition
Missouri
 Mark Haim, Missourians for Safe Energy
 Kat Logan Smith, Missouri Coalition on the Environment
Mississippi
 Louie Miller, Mississippi Sierra Club
Montana
 Florence Chessin, Missoula Women for Peace, a branch of Women's International League for Peace and Freedom
North Carolina
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 E.M.T O'Nan, Protect All Children's Environment
 Avram Friedman, The Canary Coalition
 Jim Warren, North Carolina Waste Awareness and Reduction Network
 Janet Marsh, Blue Ridge Environmental Defense League
North Dakota
 Kandi L. Mossett, Indigenous Environmental Network

Jodie L. White, The Environmental Awareness Committee, Save Our Sacred Earth Campaign

Nebraska

Buffalo Bruce, Western Nebraska Resources Council

Tim Rinne, Nebraskans for Peace

New Hampshire

Will Hopkins, New Hampshire Peace Action

New Jersey

Paula Gotsch, Grandmothers, Mother and More for Energy Safety

Norm Cohen, Coalition for Peace and Justice- UNPLUG Salem Campaign

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Joni Arends, Concerned Citizens for Nuclear Safety

Scott Kovac, Nuclear Watch of New Mexico Greg Mello, Los Alamos Study Group

Don Hancock, Southwest Research and Information Center

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Jim Haber, Nevada Desert Experience

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Joanne Hameister, Coalition on West Valley Nuclear Wastes

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Kelly Campbell, Oregon Physicians for Social Responsibility

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Sheila Dormandy, Clean Water Action Rhode Island

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Susan Corbett, South Carolina Sierra Club

Dr. Finian Taylor, Hilton Head for Peace

South Dakota

Deb McIntyre, South Dakota Peace and Justice Center

Charmaine White Face, Defenders of the Black Hills

Tennessee

Donald B. Clark, Network for Economic and Environmental Responsibility, United Church of Christ

Rev. Charles Lord, Caney Fork Headwaters Association

Rev. Douglas B. Hunt, Interfaith Power & Light

Ralph Hutchinson, Oak Ridge Environmental Peace Alliance

Rev. Walter Stark, Cumberland Countians for Peace and Justice

Ann Harris, We the People, Inc.

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Mavis Belisle, JustPeace

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Chris Williams, Vermont Citizens Awareness Network

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