

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Monday, December 23, 2013 7:51 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: Comment for Docket ID No. NRC-2012-0246  
**Attachments:** DGEIS Comment - Cutler and Cantwell.pdf

### DOCKETED BY USNRC—OFFICE OF THE SECRETARY SECY-067

**PR#:** PR-51

**FRN#:** 78FR56775

**NRC DOCKET#:** NRC-2012-0246

**SECY DOCKET DATE:** 12/20/13

**TITLE:** Waste Confidence—Continued Storage of Spent Nuclear Fuel

**COMMENT#:** 00590

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**From:** Messinger, Michael (HOU) [<mailto:Michael.Messinger@mahouse.gov>]  
**Sent:** Friday, December 20, 2013 4:24 PM  
**To:** RulemakingComments Resource  
**Subject:** Comment for Docket ID No. NRC–2012–0246

Please see attached comment from Representatives Josh S. Cutler and James M. Cantwell regarding Docket ID No. NRC–2012–0246, the DEGEIS and proposed Waste Confidence rule.

In case you have trouble opening the attachment the comment is copied below. Please do not hesitate to contact me if you have any questions.

Comment follows below:

December 20, 2013

Secretary Annette Vietti-Cook  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

Dear Madam Secretary,

Our communities are approximately ten miles from Pilgrim Nuclear Station (Pilgrim), placing them close to the impacts and risks of on-site nuclear waste storage. We write to raise concerns about the Draft Generic Environmental Impact Statement on Waste Confidence (DGEIS). In particular, we urge the NRC to further consider plant-specific impact analysis, dry cask storage of nuclear waste, and the impacts of long term plant-based nuclear waste storage.

It is important that NRC consider plant specifics when assessing the environmental impact of waste storage. Various site specific factors can alter environmental impact, including a plant's proximity to hazards, sensitive ecosystems, and

densely populated areas. A one-size-fits all approach, using an average plant, is simply inadequate for attaining a comprehensive understanding of environmental impact.

Pilgrim's situation is instructive, in that its location on the coast of the Atlantic Ocean, unprotected from storm and wave action, creates unique environmental exposures relative to an inland plant. We need look no further than the Fukushima Nuclear Plant disaster to see how destructive wave action and salt water can affect a nuclear plant's systems. When we take into account the world's rising sea levels, and the inevitability of a destructive 100-year storm, the dangers of nuclear storage for Pilgrim become even more apparent. The plant's age is also cause for concern, as former Nuclear Regulatory Commission member Peter Bradford explained at a recent panel on nuclear issues at the Massachusetts State House.

Our communities' safety and security also depend on implementing safe strategies that reduce the number of spent fuel rods stored in fuel pools. The use of spent fuel pools beyond their intended timeline or design capacity significantly increases risks of tragedy from plant failure, terrorism, natural disaster, or other hazards. We must move safely but swiftly to remove rods from pools to reduce our exposure. As one option, we strongly encourage the NRC to consider the environmental impact of requiring dry cask storage of spent fuel older than 5 years.

Furthermore, the NRC should consider the possibility that spent fuel will still be stored on-site more than 60 years after the licensed life of a power plant. There are potentially serious environmental consequences if fuel remains on-site indefinitely. By not addressing this contingency, the DEGIS fails to provide adequate assurances to us or our communities.

Currently, no alternative plan exists to storing spent fuel on-site at Pilgrim, and there will not be one for the foreseeable future. People who live in the shadow of Pilgrim deserve information about the environmental impacts of indefinite on-site storage. Moreover, this information will be invaluable during ongoing NRC relicensing decisions. Finally, information about the potential impacts of indefinite on-site storage may spur policymakers to finally develop a suitable off-site storage facility.

Every day that passes without a long term strategy to more safely store nuclear waste heightens the exposure for our communities to the destructive forces of a nuclear disaster. We appreciate the work that the NRC put into crafting the DEGIS. Our comments address what we see as deficiencies in the document, and hope that the NRC will consider our proposals as they move forward with the rulemaking process.

Sincerely,

Josh S. Cutler  
Massachusetts State Representative  
6<sup>th</sup> Plymouth District

James M. Cantwell  
Massachusetts State Representative  
4<sup>th</sup> Plymouth District

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Michael Messinger  
Legislative Aide  
Office of Representative Josh S. Cutler  
State House, Room 39  
Boston, MA 02133

Telephone: (617) 722-2014

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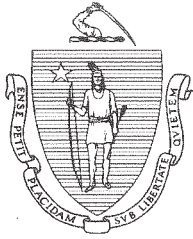
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# The Commonwealth of Massachusetts

## House of Representatives

State House, Boston 02133-1054

December 20, 2013

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U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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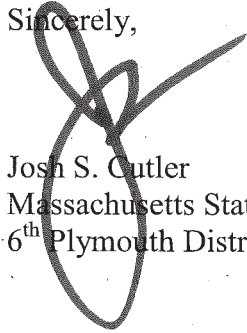
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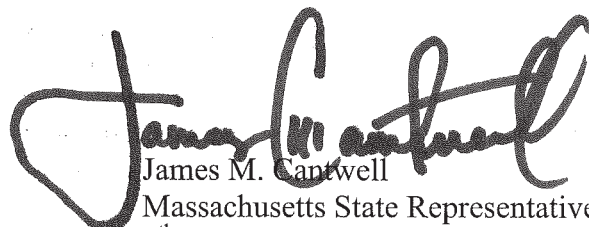
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6<sup>th</sup> Plymouth District



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