

## Rulemaking1CEm Resource

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

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**From:** Nikohl Vandel [mailto:nikohlvandel@yahoo.com]  
**Sent:** Friday, December 20, 2013 5:41 PM  
**To:** RulemakingComments Resource  
**Cc:** Tony Kay; siobahncclermont@gmail.com; businessvoodoo@gmail.com; chrisclermont@gmail.com; redswamp@aol.com  
**Subject:** Docket ID No. NRC-2012-0246

Ladies and Gentlemen:

Thank you for your considered effort to bring the issue of Nuclear Waste Confidence to the forefront of the common citizen in our nation. I believe the NRC could have utilized its connections with National Public Television and the news networks to bring even more attention of this issue to the every-day citizen not aware of nuclear power and weapons and the great risk of nuclear waste in our local communities. Yet, I do feel at some point, we do what we can do with where we are as a nation, exactly where we are, here we are.

Oh, yes, just FYI, you are best to perhaps read this aloud. (Just a warning!) If you want to hear me read it aloud, perhaps I will post it up. I will share a link if I get around to do that soon.

Fukushima: Lessons Learned, is I hope the wake-up call for the NRC to realize that the industry is not self-empowered enough to manage emergency situations. Perhaps the fear factor of being the corporation at the helm of a nuclear plant melting down was too much for the corporate executives to come out and say, "OH MY, We ARE absolutely SCREWED!" immediately. The instinctive need of corporations to protect secrecy and maintain autonomy has no place in the world of nuclear meltdowns. I think this is the fundamental level that the NRC must incorporate in its Rules of authority with the nuclear industry.

That the NRC doesn't have its own version of a SWAT team, which should be fully funded by the industry it serves, is really what is missing, imho, in the Nuclear Waste Confidence Arsenal. The containment of nuclear disaster is still a thing of guessing, hoping and praying. To still have this kind of questionable response to disasters that can alter the entire eco-system of the earth, well, you really see the point of those calling for a complete shutdown of this industry. I can say that as a mother, I do echo those conservative views. (We've got scores of natural disaster teams and several of them

should be cross-trained and, oh, yeah, that's probably already being done we just haven't seen the reality tv show yet!)

The continuation of the nuclear program must require industry to rise to a level it has never been called to do before, and it is up to the NRC to raise the calling of the industry players to more fully be responsible for their participation in that industry. If the NRC cannot do that, then likely Fukushima will be our last opportunity to learn a lesson about nuclear power here on earth. Maintaining or diminishing current regulatory levels that created the present on-going nuclear waste confidence issue will produce more of the same.

With an eye toward the four specific questions the NRC requested of the public, I made some notes on the Proposed Rule, as follows, but first, if you will indulge my little mini rant from G+:

The problem with reading something like the Federal Register is that there are so many voices involved in the writing, there is no "bottom line" its like a "middle ground" at best.\* Unfortunately for the #GlobalNuclearIndustry, they are irresponsible stakeholders and their input to the voice of the Federal Register is too loud for the #commondefense of our nation, and in truth, our planet. But, I'm just sayin' .....

The industry could and should do better at being a responsible part of the nuclear waste water reclamation for the benefit of New Industry. Clearly, as we witness the ONGOING disaster of #Fukushima, we are reminded that if such a disaster would strike here in America, the same response MUST be expected by the current #GlobalNuclearIndustry.

Without an adequate #NuclearFirstResponseTeam, the thought of what a disaster at #DiabloCanyonNuclearFacility under the "control" of PG&E is simply, beyond depressing. It brings so much fear of death and destruction to that region, of course its depressing and scary and why do we do this to ourselves?!

Stop all the nuclear power plants, which is what it seems like we are doing; Stop the mining, looks like that is also being restored (at least in our nation), Just STOP! Now breathe. Again. Breathe. Again. Breathe.

We do not know how to contain nuclear waste. We do not know how to store it so it does not harm our natural environment because every environment we put it into it irreparably alters and changes that environment.

We have plenty of #spentnuclearwaste to practice on, to reclaim, to recycle, to use up, to facilitate the rest of our learning curve.

A moratorium on the #GlobalNuclearIndustry should be called for UNTIL full #fukushimacontainment.\*\*

#commondefense#Fukushima#NuclearFirstResponseTeam#DiabloCanyonNuclearFacility#spentnuclearwaste#GlobalNuclearIndustry#fukushimacontainment

\*in working on this problem, and being so new in this nuReg game and now jumping back into dialogue having left it for a while, I found that there was no common ground except the one that I saw. I think many who could not express their opinions at the meetings also saw that common ground, and it is to them my comments will be most understandable.

\*\* I believe that if the US NRC wants to be a major player in the global scene, it is time for it to empower itself to that level and take a bold role of leadership amongst its peers, and support in common those with whom humanity's "common defense" is held, the Original Nations, the United Nations and other globally recognized governments -- as opposed to those global economic clubs we seem to mostly be beholden to because ??!!! (tangent, I know.)

Ok, so, specific notes, since you now know the root of where I am coming from, RESPONSIBILITY. When an industry does not self-regulate, it is imperative of the people to operate for the "common defense", and, the NRC's Mission, indeed, every Mission for every governmental agency incorporates that specific intention at the root of all its rules and actions:

1. Federal Register Vol 78, p. 56776, "The analysis in NUREG 2157 ..." I guess the only problem with the generic environmental approach is the reality of emergencies, and I think that is what everyone outside of the industry is objecting to -- how do you have a generic approach to such different realities? And, the truth is, every nuclear facility is unique. But I do think that the NRC did its best to associate apples with apples and oranges with oranges in order to make generic the consistent ways nuclear waste imposes its threat on the natural environment. However, when the generic level of waste management parameters are so low as to pose such a considerable risk across the board, not even broaching into the emergency realm, this is where the NRC does disservice to its mission, the industry and most definitely the Stakeholders. The quality acceptable to the Commission is simply too dependent on industry self-regulation, and in our current corporate climate, that is too hazardous for history to say "we did it right."

The comedy of still including the 60 year mined geologic repository is lessened by the court's ruling on Yucca Mountain this past summer, but I do not think that the NRC does itself nor instills confidence by including this language and even idea when no determination to create such a site has been fully implemented.

2. Federal Register Vol. 78, p. 56780, In response to "A6" and "A7." Mostly, it seemed that these answers were for the "nuNukes" -- the newer nuclear technology, rather than the established power plants in operation. The statement that made me cringe, was, "Small modular will use fuel very similar in form and materials to the existing operating reactors and will not, therefore introduce new technical challenges to the disposal of spent nuclear fuel." Ok. But, since we have EXISTING technical challenges (never mind any NEW ones) in the maintenance of spent nuclear waste, and we all know this is reality, what does this really mean?

Is the NRC is going to use the old standards for the new plants and that's acceptable?

AND THEN, further answering, I read that the NRC is involved in developing yet untested nuclear material and ... oh, boy, where will this expansion take, except, once again, we have the problem with the present reality, Fukushima is STILL at an emergency state with no solution in sight, and all of our existing projects have serious ecological issues that this Waste Confidence Rule taps dances around by saying all the wonderful things developing in the nuclear industry. AND YES, wonderful ideas and projects, absolutely fascinating!!! BUT, NO! This Industry is GROUNDED! Until someone cleans their room, they are not able to work on that new science project. Common defense, common sense, common goals.

"SAFETY FIRST" with any and all science projects, and most definitely with the nuclear facilities within the regulation of the government. The Court's have said that, right?! That's what I thought was the Court's reason in this whole rethinking idea we are doing, right?! But, maybe I'm wrong. I've been wrong before!

So, back to the FEDERAL REGISTER, not some Industry Pamphlet ... While they are wonderful ideas and THANK YOU for expanding the nuclear energy projects and, THANK YOU to whomever it was at the NRC to at least point out that it is all untested and we don't know what will happen disclaimers, of course, the question is -- How does this serve the mission of the NRC? When all the people are sick and dead, how does this kind of approach to rule making serve the mission of the NRC? It doesn't. Why is this in the Federal Register?! Thank you at least for putting my comments in the record.

3. Federal Register Vol. 78, pp. 56780-81. Oh! And there you answer my last question for me. Or rather the NRC does not. It does tell all about the technical ways and means of spent nuclear waste, but not a single mention of the environmental impact that happens in the existing facilities. The problem with using a generic formula for nuclear issues -- the nature of nuclear science. When exposed to radiation, EVERY single eco-system is going to respond soooooo differently based on material compounds of the water -- I mean, seriously, has anyone taken a sample of the #Fukushima #nuclearizedwater and mixed it with some of that #NorthAtlantic #radioactivewater? I mean, seriously, what is going to happen up there in the Arctic Ocean?! I hope someone else really smart who studies the impact of nuclear waste radiation on the things like viruses and fungi in specific locations near different radioactive sites has submitted some thoughts on this whole Generic Thing.

I completely understand the need for it, the Generic Rule, but the question I have is: Has the NRC really gotten to the root issues for implementing a Generic Rule that does not undermine the Common Defense?

I would have to say, based on the fact that I could not find in all of those words in the Federal Register anything that gave me confidence that THIS industry here in the United States of America would not do the same thing their peer did in Japan. In which case, this NRC Generic Rule MUST be way more detailed in the specifics than it currently is.

I had more comments, but I am sure someone else covered them way less ... #nikified.

Thank you so much for your dedication to just reading this one thing all the way through.  
Do your best and be bold in your life, be an american.

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contribution by: Nikohl Vandel and Elaine Vandenberg Clermont

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