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From: RulemakingComments Resource
Sent: Thursday, December 26, 2013 3:47 PM
To: Rulemaking1CEm Resource
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Subject: PR-51 Waste Confidence
Attachments: 1146 lynch.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#: 00753

Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 779

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D0014433C4A178)

Subject: PR-51 Waste Confidence
Sent Date: 12/26/2013 3:47:26 PM
Received Date: 12/26/2013 3:47:26 PM
From: RulemakingComments Resource

Created By: RulemakingComments.Resource@nrc.gov

Recipients:

"RulemakingComments Resource" <RulemakingComments.Resource@nrc.gov>

Tracking Status: None

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Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	254	12/26/2013 3:47:26 PM
1146 lynch.pdf	84850	

Options

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

PUBLIC SUBMISSION

As of: December 20, 2013
Received: December 19, 2013
Status: Pending_Post
Tracking No. 1jx-89e1-e22q
Comments Due: December 20, 2013
Submission Type: Web

Docket: NRC-2012-0246

Consideration of Environmental Impacts on Temporary Storage of Spent Fuel After Cessation of Reactor Operation

Comment On: NRC-2012-0246-0456

Waste Confidence - Continued Storage of Spent Nuclear Fuel; Extension of Comment Period

Document: NRC-2012-0246-DRAFT-1146

Comment on FR Doc # 2013-26726

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General Comment

70 years into the Atomic Age, and 55 years into commercial nuclear power, and still no deep geologic repository; no permanent, safe location or technology has yet been found to isolate this radioactive waste from the biosphere; it's high time you stop making it! The pools are filled and most now contain decades of accumulated waste, multiple atomic reactor cores-worth of ultra-hazardous irradiated nuclear fuel. Instead of emptying most of the irradiated fuel to dry casks to restore the pools to their original designed low-density configuration, most nuclear plants have kept pools as full as possible regardless of the potential high risk of a pool fire.

I reject NRC's waste confidence Draft (GEIS), and ask NRC to withdraw it for thorough revision. I believe it has no scientific validity. I have NO confidence in NRC's Waste Confidence.

The Draft GEIS claims that the environmental impact of long-term or indefinite storage is small. This is hypothetical ... given the known extreme hazards of radioactive wastes and the lack of any experience of storing these toxins for even a hundred years, let alone hundreds of thousands of years.

The Draft GEIS claims that impact of a severe accident would be small. Such a conclusion cannot be supported by logic or experience. A severe accident would release deadly radioactivity into the environment. Every release of manmade radioactive matter into the environment to date has had serious and long-lasting impacts on humans and other living things within the area affected.

The Draft GEIS assumes that the impact of terrorism would be small. However, according to the National Institute of Health, an attack on a nuclear reactor could result in a "massive release of radioactive material."

Unrecognized in the Draft GEIS is the fact that no civilization and no human institutions have lasted for hundreds of thousands of years. Any credible plan must include ways to mitigate the risks of environmental contamination in the event of failure of governments or institutions. A realistic plan must be devised to keep manmade radioactive elements isolated from the biosphere for the million years that the EPA declares them to be lethal.

I believe no industry should be allowed to continue creating high level radioactive waste (HLRW) that it has no ability to dispose of. Since neither the nuclear industry nor the Federal Government has an operating spent-fuel/high-level radioactive waste disposal facility in operation, it should not be allowed to manufacture any more of these wastes. Since you have no place to dispose of radioactive spent fuel why are you still allowing 100 atomic reactors across the U.S. to continue churning out 2,000-3,000 metric tons (2,200 to 3,300 tons) of HLRW yearly? This is in direct contradiction to your obligation of safety first for the wellbeing of people and the environment.

NRC should not be allowed to issue new reactor licenses, nor grant license extensions to old operating reactors until a permanent, deep-geological high-level radioactive waste disposal facility is built and operating.

No state is a waste dump! We don't want any more high-level radioactive wastes coming "to or through" our states. We do not want to see more high-level, long-lived radioactive waste coming to proposed so-called "centralized interim storage" waste facilities (a.k.a., "parking lot dumps") here or anywhere else.

In June of 2012, in a lawsuit brought by New York state the U.S. Court of Appeals threw out NRC's Waste Storage Rules saying the commission failed to fully evaluate risks associated with its regulations on the storage of spent fuel. The U.S. Court of Appeals ruled that the NRC's conclusion that permanent storage will be available in the future when it's needed didn't account for how its absence could affect the environment now. The commission also failed to fully assess the dangers of storing spent fuel onsite for 60 years after a nuclear plant's license expires, the court said. "The commission's evaluation of the risks of spent nuclear fuel is deficient," Chief Judge David Sentelle wrote for the three-judge panel. Spent fuel "poses a dangerous long-term health and environmental risk."

If there was just one lesson to be learned from the ongoing nuclear catastrophe in Japan it is that our best science and engineering is no match for the unpredictable forces of nature. It is time to make it a national priority to find real solutions to stop this ticking time bomb before it is too late.

Therefore, I believe the NRC must:

- Make it a national priority to come up with real solutions to long term nuclear waste storage;
- Abandon the generic "one size fits all" approach and instead, make site-specific environmental reports and recommendations;
- Immediately reduce spent fuel pool density to original design standards, without exemptions;
- Accelerate ongoing hardened, on-site storage of spent fuel at all reactor sites; and
- Cease production of all nuclear waste!