

## **Rulemaking1CEm Resource**

---

**From:** RulemakingComments Resource  
**Sent:** Thursday, December 26, 2013 3:55 PM  
**To:** Rulemaking1CEm Resource  
**Cc:** RulemakingComments Resource  
**Subject:** PR-51 Waste Confidence  
**Attachments:** 1139 johnson.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#:** 00762

**Hearing Identifier:** Secy\_RuleMaking\_comments\_Public  
**Email Number:** 788

**Mail Envelope Properties** (377CB97DD54F0F4FAAC7E9FD88BCA6D0014433C4A184)

**Subject:** PR-51 Waste Confidence  
**Sent Date:** 12/26/2013 3:55:27 PM  
**Received Date:** 12/26/2013 3:55:28 PM  
**From:** RulemakingComments Resource

**Created By:** RulemakingComments.Resource@nrc.gov

**Recipients:**

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

Tracking Status: None

"Rulemaking1CEM Resource" <Rulemaking1CEM.Resource@nrc.gov>

Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	254	12/26/2013 3:55:28 PM
1139 johnson.pdf	81207	

**Options**

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

# PUBLIC SUBMISSION

<b>As of:</b> December 20, 2013
<b>Received:</b> December 19, 2013
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 1jx-89dy-axx7
<b>Comments Due:</b> December 20, 2013
<b>Submission Type:</b> 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-1139

Comment on FR Doc # 2013-26726

---

## Submitter Information

**Name:** Roger Johnson

---

## General Comment

As a resident of San Clemente, CA, I would like to strongly oppose the GEIS report. Our town shares the same zip code as San Onofre, and now you want us to share the nuclear waste, possibly forever. When the plant was built, you promised that the waste would never remain here, and now you are renegeing on that promise. There isn't any city or town in Southern California which is a suitable site for a nuclear waste dump, and certainly not ours. San Onofre is situated in an earthquake and tsunami zone in the middle of two large metropolitan areas. It is an extremely inviting target for terrorists. The waste is stored in an extremely vulnerable location with free public access on all sides: it is a few hundred feet from a public beach and a few hundred feet from an important Interstate Highway.

Nuclear waste has been accumulating here since 1968. We have housed it long enough (about a half-century) and it is outrageous that you want to keep it here for another 60 years (or 160 or forever). The GEIS report is not a plan. Rather it is an avoidance of responsibility. The NRC logo says "protecting people and the environment" but this is a plan to do the opposite. The idea of labeling this time period as "short term" and "temporary" is irresponsible.

Since the GEIS report is not a plan but rather a continuation of doing nothing, you need to completely revise it with a serious plan. Here is a suggestion: The government owns millions of acres of land, much of it isolated and remote, much of it on secure military facilities. There are many possibilities for temporary storage sites on such remote locations. Sites could be regional or state-specific to avoid federal issues. What is required is only a pad, not an elaborate repository. This would be designated as a temporary waste storage facility until a permanent repository is opened. Current nuclear power plants were never designed to be long term (anything over 20 years) waste storage facilities. San Onofre especially is totally unsuitable and it cannot be turned into a long term storage facility just by changing its name.

Moving waste to remote sites has many powerful advantages: (1) Waste can be removed from tsunami and earthquake prone areas; (2) Waste can be stored far from population centers; (3) waste can be stored in secure

areas away from public access; (4) waste stored in a remote temporary site would be mostly immune from terrorist threats since terrorists would not be interested in targets far from population zones.

Please rewrite the plan to say the following: (1) All waste currently in transportable casks should be moved to the designated temporary site within one year. (2) All waste which is safe to remove from pools should be done so immediately with a high-priority accelerated schedule. Once in casks, it should be moved quickly to the temporary storage area. (3) All remaining fuel in the pools should be removed and casked and sent to the site as soon as the fuel is cool enough to place in dry casks. (4) All fuel pools at closed plants should be emptied ASAP.

In addition to a real plan like that outlined above, here are some more suggestions:

- (1) The plan should specify close cooperation with local cities and towns.
- (2) The plan should include Class C or greater waste (rather than exclude it as the current GEIS plan does).
- (3) The plan should be site-specific, not generic. The failure of the GEIS plan to make important distinctions based on particular situations is particularly troubling. How can the NRC write a report which states that earthquakes, tsunamis, human error, breakdowns, and terrorist vulnerability are trivial issues not worth worrying about?
- (4) The plan should be based on science, not on PR considerations. The GEIS report reads like a PR document promoting the nuclear industry. It minimizes, ignores, dismisses and trivializes true dangers. It grossly overstates safety and expresses blind faith in the most optimistic possibilities. Its excessive reliance on probabilistic risk analysis is unwarranted and unprofessional. Everyone knows that risk analysis is heavily flawed and full of questionable assumptions.
- (5) The dismissal of terrorist attacks shows that this is not a serious report. Everyone who has read the Sandia reports knows that a truck bomb (or missile, or high explosives, etc.) outside the perimeter could have disastrous effects on fuel pools. Nuclear power plants were never designed to be fortified against such attacks, and any report which ignores this is a report not to be taken seriously.

Roger Johnson, PhD  
Professor Emeritus  
Dec. 16, 2013