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Attachments: Comment from Keith Gunter & Carol Izant on behalf of Alliance to Halt Fermi received via mail.pdf

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December 17, 2013

Secretary

U. S. Nuclear Regulatory Commission

Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

Re: Waste Confidence Generic Environmental Impact Statement

Draft Report for Comment, NUREG-2157

Docket ID No. NRC-2012-0246

Email to Rulemaking.comments@NRC.gov

We are emphatically opposed to the NRC's proposed Waste Confidence Rule (10 CFR 51.23) as well as the premises, assumptions and conclusions of the NRC's Waste Confidence DGEIS.

According to a 2011 Time magazine story, in-ground pools are located in buildings next to operating reactors at 73 U.S. sites; attic pools, like the ones at Fukushima, are used at 31 plants. Each pool is a massive radiological dirty bomb waiting to ignite. A 1997 Brookhaven National Laboratory study said such a disaster at one irradiated fuel pool could result in 138,000 deaths and contaminate 2,000 square miles.

The NRC dismisses this sort of catastrophe by claiming it has calculated the possibility of such an event to be vanishingly small, because of multiple redundant safeguards. Such calculations were also used to prove the possibility of meltdowns at Fukushima was vanishingly small. These calculations of risk are reminiscent of the flawed fault-tree analysis calculations of the discredited MIT Rasmussen Reactor Safety Report of the 1970's.

The assumptions on which the Waste Confidence GEIS is based (listed on p. xxvi) are absurd. "Spent fuel canisters and casks would be replaced approximately once every 100 years." and "Independent spent fuel storage installation (ISFSI) and dry transfer system (DTS) facilities would also be replaced approximately once every 100 years."

What this says is that the NRC believes no known design for dry storage of spent fuel can be expected to last for more than 100 years. There is no way to guarantee a future society will have resources or social organization to replace such facilities, and yet the NRC insists - by blandly making an assumption - that this capability will exist into the indefinite future.

Spent fuel should be secured in three ways:

First, it should be passively safe. The waste should remain safe without relying on electricity, cooling water or a human crew. This does not apply to continued storage in spent fuel pools,

which require a continuous flow of cooling water and other active maintenance.

Second, the facility where the waste is stored should be Hardened On-Site Storage (HOSS) systems to resist anti-tank missiles, crashed commercial jets and similar means of attack. At ground level, this would mean layers of concrete, steel, gravel and other substances around and above the spent fuel. Neither spent fuel pools - especially the "attic pools" of the GE Mark 1 design - nor dry casks by themselves meet this criterion.

Third, the waste should be decentralized; that is, stored on the sites of nuclear plants, not at a centralized facility, and dispersed around each reactor site if possible. The NRC has not proposed any sort of hardened storage which is the safest option.

In Michigan and around the Great Lakes basin, citizens, corporations, and governments alike are responsible for the largest amount of surface freshwater in the world. Including Canadian reactors, there are 33 reactors on the Great Lakes basin which is even more reason to implement HOSS at all of these facilities.

In summary, NRC risk calculations are demonstrably wrong, the assumptions made by the NRC are absurd and the NRC has not proposed a realistic plan for coping with spent nuclear reactor fuel. The logical conclusion is to stop making more spent fuel, remove as much as possible as soon as possible from storage in pools, and recognize that dry casks, while better than pool storage, are not an adequate plan.

Signed on behalf of the Alliance to Halt Fermi 3,

Keith Gunter, Co-chair

Handwritten signature of Keith Gunter in black ink.

Carol Izant, Co-chair

Handwritten signature of Carol Izant in black ink.