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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-1249

Comment on FR Doc # 2013-26726

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General Comment

See attached file(s)

Attachments

comment on NRC GEIS Docket No. MRC-2012-2046

December 20, 2013

**RE: Comments on Waste Confidence Generic Environmental Impact Statement (GEIS) Draft Report,
Docket ID No: NRC-2012-0246**

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Via e-mail to Rulemaking.Comments@nrc.gov and on www.regulations.gov

My name is Sally Jane Gellert, and I live at 210 Broadway, Woodcliff Lake, New Jersey. Thank you for allowing me to express some of my concerns regarding nuclear waste. My home is just about 50 miles from Indian Point by main roads, but substantially less (32 miles) by back roads or as the crow flies. Although I have long been aware of environmental issues, once Indian Point opened I did not pay too much attention to it. Recently, however (even before the tsunami, earthquake, and meltdown at Fukushima Daiichi), I have begun to learn more about the Indian Point nuclear facility, and frankly what I have learned scares me.

We know that the risk of a serious problem at a nuclear reactor is small, but the consequences can be so severe that it would be dangerous and irresponsible to ignore them. I realize that the courts have ruled that it is acceptable to create a Generic Environmental Impact Statement; to me, this implies not a reactor in a perfect, low-population rural area, but considering a worst-case scenario—which Indian Point embodies in many ways. If—and it is a big IF—we can be confident about nuclear waste at Indian Point, then (and only then, in my opinion) can we be confident about nuclear waste at other nuclear power plants.

Indian Point lies on 2 fault lines; it is considered by some to be in the least safe site of any reactor in the country. We in the Hudson Valley and New York City metropolitan area, including northern New Jersey, live with possible disaster as a remote yet frightening possibility. In addition, of course, Indian Point leaks invisible radiation constantly, as well as heating the river water that it draws in vast quantity in everyday operation of the reactors and to cool the ever-increasing number of irradiated fuel rods. These day-to-day dangers are outside the scope of this hearing, but are affecting us every day, whether or not we acknowledge it publicly.

The NRC considers the risk of spent-fuel pool fires “inconsequential”—but for residents nearby, they would be disastrous. In addition, new technologies create new risks; for the past 16 years you have allowed “high-burn-up fuel”, which burns longer and hotter in the reactor; when removed, this fuel needs up to twice as long in cooling pools as well as more space between fuel rods in the already-crowded pool. When a colleague asked about the percentage of high-burn-up fuel at Indian Point, it was suggested to her that that information might not be released for reasons of “national security”. However, local security must also be considered: without enough of an estimate to understand whether the irradiated fuel rods are being stored safely, I am concerned that Woodcliff Lake and the area surrounding Indian Point and other reactors are even more at risk than they inherently are simply because of the nuclear reactors. I therefore request that this information be made public and that priority be given to ensuring that neighbors of these installations have all the information we need to ensure that all that can be done to protect our health and property is in fact being done.

Regarding storage of nuclear waste both here and across the country, I firmly believe that the risks of transportation are greater than the risks of storage on site. Transporting highly radioactive fuel over the highways raises the specter of many possible errors and accidents: from collisions, to mechanical breakdowns, to spills in areas far from any nuclear facility, which of necessity would have to be handled by hazardous-material personnel who, despite being professionals, are unlikely to have experience or training in handling highly radioactive nuclear waste. In fact, even here, with Indian Point right here, when a

worker at Indian Point was exposed to radiation and transferred to the local hospital emergency room, the incident required evacuation of the emergency room for a number of hours; if there had been a much bigger incident, the region would have been without a working facility for a much longer time.

There is currently not a realistic plan for centralized national storage, and I would prefer to see efforts being spent not on trying to create one, but instead on providing the safest possible storage on site at reactors across the country. I realize that this means permanent storage of Indian Point waste less than 50 miles from my home, but that is a consequence of decisions made that cannot be reversed. Therefore, I request that we look toward minimizing the scope of local danger by shutting the reactors and generating no more radioactive waste. Until they are shut down, there are “routine” low-level releases of unknown impact on public health.

In addition, I would request that all irradiated fuel rods be put into hardened on-site storage, with berms, as soon as possible, rather than waiting until the fuel pools are filled. The longer we have to keep cooling those pools, the greater the risk of a failure and consequent disaster. As we saw at Fukushima, the dry casks survived—they did not explode, burn, or leak as the fuel pools did. In addition, dry casks do not need a continual inflow of liquid to prevent further destruction; they are instead passively cooled by airflow.

Although I think that, as a society, we place too much emphasis on terrorism in the “post-9/11 world”, it is nevertheless true that spent fuel pools are more attractive to terrorists than hardened on-site dry-cask storage; that simply adds to the advantage of changing our current system that is inherently less risky.

After Frankenstorm Sandy, I am especially concerned that the NRC has not updated its computer simulations and accident-probability calculations to reflect greater likelihood of the electric power grid going down. As it was, despite the “evacuation routes” being completely closed, Indian Point continued to operate as the water rose (remember: the power was out—there was no need for it to keep generating electricity!). Many of us called to check on the situation as the storm progressed; we were transferred from office to office without our questions being answered; nobody really seemed to know what was happening. We turned to the experts for answers; they had none. Loss of off-site power is a major contributor to accident scenarios at nuclear reactors. Many potential scenarios would also include damage to the fuel pool and its back-logged waste inventories. In addition to making weather events more severe, climate change is increasing water scarcity, giving us yet another reason to move away from fuel pools as rapidly as possible: we simply cannot be sure that water of sufficient quantity will be available in the case of accident.

In closing, discussing “waste confidence” is almost absurd. The waste being created (adding to the 80,000 tons of spent nuclear fuel that will remain toxic for 240,000 years or even longer) is a pending disaster. To consider moving this quantity of dangerous waste would be irresponsible even if we had someplace to put it. To continue to create more is to ignore the very real dangers and to fall back on public relations as a panacea for the generally trusting public, which remains unaware of the potential for disaster lurking nearby.

I heard some statements at the hearing that I feel obliged to refute. There were repeated references to nuclear power as “clean air” electricity. This might be true at the site (if one wants to simply ignore the ongoing leaks of radiation); it is clearly not at all accurate when considering the entire cycle, from mining of yellowcake, through enrichment, transportation, and processing. When the full cycle is considered, nuclear energy is highly intensive in its use of fossil fuels—and has perhaps the greatest impact on native Americans near uranium mines and other people living in environmental justice communities.