

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Monday, January 06, 2014 3:14 PM
To: Rulemaking1CEm Resource
Cc: RulemakingComments Resource
Subject: PR-51 Waste Confidence
Attachments: 1286 taylor.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#: 00850

Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 886

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D0014435D73149)

Subject: PR-51 Waste Confidence
Sent Date: 1/6/2014 3:14:01 PM
Received Date: 1/6/2014 3:14:02 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	1/6/2014 3:14:02 PM
1286 taylor.pdf	83561	

Options

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

PUBLIC SUBMISSION

As of: January 02, 2014
Received: December 20, 2013
Status: Pending_Post
Tracking No. 1jx-89es-lwer
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-1286

Comment on FR Doc # 2013-26726

Submitter Information

Name: Tom Taylor

Address: United States,

Email: drtctaylor@gmail.com

General Comment

The NRC should abandon its Waste Confidence policy, stop the creation of nuclear waste, and come up with a plan that actually mitigates the enormous risks associated with existing nuclear waste. The Waste Confidence policy is founded on overconfidence. I am confident that the waste can never be safely contained for as long as it poses a hazard. Creation of radioactive waste puts the public at grave risk and it transfers the financial and physical responsibility for waste management to future generations.

By virtue of waste toxicity and longevity, a management and financial burden which cannot be ignored is being passed to future generations. No level of confidence will result in the financial or management risks, or exposure consequences, diminishing. Radioactive waste is not safe, clean or green. It lasts for more than 240,000 years and it irradiates cells and damages DNA, causing cancer, birth defects, heart problems, kidney problems, infertility, immune deficiencies, and more. There is no safe dose of radiation.

Nationwide, there is now over 80,000 tons of spent nuclear fuel. No known technology exists to safely store radioactive waste and protect the environment for the period it remains hazardous. There is no known permanent nuclear waste facility in the US in which to store all the existing waste. The use of temporary storage does not create any confidence the waste will be safely or permanently stored for the period required until it is not hazardous.

NRC's Waste Confidence policy assumes that all nuclear waste is homogeneous. The reality is that the use of MOX and high burn-up fuels are more radioactive, dangerous, thermally hot, and difficult to store and transport safely. These realities do nothing less than undermine confidence that waste can be safely handled and stored.

The risks and perils of storing nuclear waste at reactor sites continue to be ignored. This creates false confidence. Spent fuel is highly flammable and radioactive, yet is primarily stored in densely packed pools of water that contain several times more radioactive fuel than in the nuclear reactor itself. If the cooling system of a fuel pool fails, fuel rods could be exposed and catch fire, resulting in the release of massive quantities of radioactive material. Approximately 111- 120 million people, about 40 percent of all the Americans, live within 50 miles of a nuclear plant in the US. Policies which rely on temporarily storing waste in spent fuel pools anywhere near populated areas, are reckless. Population evacuation in response to a serious reactor or spent fuel pool accident is a wishful fantasy.

The NRC has yet to recognize the risks related to solar flares, their incapacitating impact on the nation's electrical infrastructure, and the resulting impact on the ability to cool nuclear power plant spent fuel pools. Nuclear power plants and their electrical systems have not been made impervious to the effects of such electrical storms. A large solar flare has the potential to incapacitate the nation's electrical distribution infrastructure for years and/or render all electrical components at plants inoperable. In either scenario, the lack of a constant source of power to the spent fuel pool cooling systems will inevitably result in radiological fires at all spent fuel pools across the US.

The risks associated with spent fuel pools are real, and extreme consequences of mishaps, accidents, and space weather are relevant. Hardened On-Site Storage systems (HOSS) should be used immediately to store spent fuel more safely and securely at all near nuclear plants until a permanent storage solution is developed. HOSS solves many of the immediate dangers nuclear waste poses, without creating unnecessary risks associated with water cooled spent fuel pools.

The U.S. has no solution for nuclear waste, and the NRC up to this point has done little to address the immediate risks it poses. It is not in the public interest to ignore underlying risks, technical deficiencies, and base a licensing policy on false confidence. There are clean, reliable, renewable, and lower cost energy alternatives to nuclear power.

Waste Confidence ignores 1) the absence of a technological solution to safely store waste until it is not hazardous; 2) the absence of a nuclear waste facility in which waste can be permanently stored; 3) the ongoing high level risks associated with Spent Fuel Pool Storage, and the proximity of said fuels near millions of US citizens.

There is no safe storage solution for nuclear waste. The NRC's new Waste Confidence policy is no more credible than the one the Court threw out. The NRC should throw out this overly optimistic policy, observe the Court's ban on licensing nuclear reactors, and come up with a realistic plan that safely and permanently stores waste until it is not hazardous and that does not attempt to pass the burden and costs of managing radioactive waste to future generations or to taxpayers.