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From: RulemakingComments Resource
Sent: Monday, January 06, 2014 3:17 PM
To: Rulemaking1CEm Resource
Cc: RulemakingComments Resource
Subject: PR-51 Waste Confidence
Attachments: 1289 davis.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#: 00853

Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 889

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D0014435D73151)

Subject: PR-51 Waste Confidence
Sent Date: 1/6/2014 3:16:47 PM
Received Date: 1/6/2014 3:16:47 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 3:16:47 PM
1289 davis.pdf	82604	

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-c4ou
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-1289

Comment on FR Doc # 2013-26726

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General Comment

Thank you for the opportunity to provide comment on the Proposed Rule document issued by the Nuclear Regulatory Commission entitled, “ Waste Confidence- Continued Storage of Spent Nuclear Fuel”.

I find it difficult to comment on a safe alternative to spent nuclear fuel when the very premise that ANY nuclear fission, fuel or waste can be deemed safe is seriously, intrinsically flawed. Nevertheless, the grim reality is that we do, in fact, have thousands of tons of highly lethal of spent nuclear fuel on site in at virtually all United States nuclear power plants.

These aging nuclear power plants should NOT be granted operating extensions beyond their “safe” and originally approved lifespans. I believe that ALL nuclear power plants should be shut down, decommissioned, with no new nuclear reactors developed as this is an unsafe, economically and ecologically unsustainable technology. (There are other, less deadly viable energy alternatives.) There needs to be an end to the production and/or reprocessing of spent nuclear fuel. This will in turn, make finite the total amount of spent nuclear fuel to be stored.

There is roughly 60,000 tons of spent fuel in the USA that are not stored in dry caskets, or “Casked”. USA generates around 2000 tons a year, and it takes approximately five years to cool enough spent fuel to be Casked. Thus, approximately 10,000 tones are awaiting dry cask storage (i.e., 5 X 2,000 tons). This leaves approximately 50,000 tons that could be and SHOULD BE Casked immediately.

The total cost with labor and materials will be around \$11.25 billion (US) B to dry cask all the spent fuel Dry

Casked, or roughly about \$225,000 per ton.

This approach is viable from a safety perspective, but also from an economical perspective. It will cost approximately \$14.375 billion (US) to dry cask ALL of the spent fuel in the USA up to 2020. However, this expense will be off-set by approximately \$4.8 billion (US) as an economic infusion through job creation for US trade workers.

Additional cost avoidance of approximately \$24 billion (US) from potential litigation can be gained with this Dry Cask Storage approach. Please note that other potential risks, such as risk of disaster or terrorist attacks, are not included in this calculation but could be significant and debilitating from an economic and/or social perspective.

So, we can create US jobs and “fix” the spent fuel storage problem for the next 50 years (while we figure out a longer term solution) or we can risk litigation and the economic and environmental disaster that will surely accompany a natural, technological or/or human-made nuclear disaster.

To summarize: dry cask store the spent nuclear fuel now; create jobs; invest in alternative, safe energy; and shut-down all US nuclear power plants NOW.