

## **Rulemaking1CEm Resource**

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**Docket:** NRC-2012-0246

Consideration of Environmental Impacts on Temporary Storage of Spent Fuel After Cessation of Reactor Operation

**Comment On:** NRC-2012-0246-0361

Waste Confidence - Continued Storage of Spent Nuclear Fuel

**Document:** NRC-2012-0246-DRAFT-1279

Comment on FR Doc # 2013-21708

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## General Comment

I would like to respond to the Nuclear Energy Institute's (NEI's) self-serving claim that the Nuclear Regulatory Commission (NRC) "need not assess the environmental impacts of nuclear plant operation more generally" in order to fulfill the requirements of the Waste Confidence Decision (WCD). This is for Docket I.D. No. NRC-2012-0246.

Perhaps this is true -- they "need not" as in, it is not explicitly stated that they do so by the judgement. But assessing environmental impacts of nuclear plant operation more generally is implicitly required because if there is no waste confidence, it is immoral to continue making nuclear waste.

Furthermore, if the costs of waste disposal are so great as to make it impossible to operate nuclear power plants cost-effectively, that fact must be recognized. Once the economic and environmental realities are acknowledged, it becomes possible to assess whether the "intractable" problem of storing ever-increasing quantities of spent nuclear fuel is best solved by not making any more in the first place. On the other hand, one only has to look at Fukushima to know what will happen if we keep on running our nuclear reactors until they break. Loss of lives. Loss of land. Loss of income.

For these reasons it is equally inappropriate for the NRC staff to repeatedly describe nuclear waste management as "a small piece of the puzzle" as they have been doing. Waste Confidence is a lynch-pin, an Achilles' Heel, a show-stopper. Over time it will undoubtedly become the most expensive piece of the puzzle, by far -- not small

at all.

No wonder NEI is attempting to convince the NRC to interpret the WCD as being so restricted in scope such that the sheer lunacy of producing more nuclear waste in the first place is ignored! NEI claims that "site-specific and generic" Environmental Impact Statements (EISs) cover all permutations of this basic question: Is what we're doing logical? However, they do not: Invariably, ALL other NRC and DOE EISs assume that the waste problem can be solved, thus relegating the dangers of continued operation, continued production of nuclear waste, and continued mining of uranium to matters which can be assessed through Probabilistic Risk Assessments (PRAs). In reality, PRAs utterly fail to assess the dangers of ongoing operations with no end in sight. 100-year floods and earthquakes become inevitable instead of rare if you wait long enough -- and that seems to be exactly what the nuclear industry wants: For us all to wait until there is a disaster, only to claim they never saw it coming.