Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Tuesday, January 07, 2014 9:50 AM
To: Rulemaking1CEm Resource
Cc: RulemakingComments Resource
Subject: PR-51 Waste Confidence
Attachments: Email comment of Steven Sondheim (combined).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#: 00828

Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 911

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D0014435D732A9)

Subject: PR-51 Waste Confidence
Sent Date: 1/7/2014 9:49:49 AM
Received Date: 1/7/2014 9:49:51 AM
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	1/7/2014 9:49:51 AM
Email comment of Steven Sondheim (combined).pdf	198262	

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

RulemakingComments Resource

From: StevenSondheim <StevenSondheim@yahoo.com>
Sent: Friday, December 20, 2013 7:13 PM
To: 11Net; RulemakingComments Resource
Subject: Re: http://sanonofresafety.files.wordpress.com/2013/11/wasteconcommentsdgilmoresubmitted2013-12-19docketnrc-2012-0246.pdf

I apologize for the trouble getting the proper link to go w my comments. The link
Below should be correct. Please reference this link at the bottom
Of my comments.

Steven Sondheim

On Dec 20, 2013, at 6:08 PM, StevenSondheim <StevenSondheim@yahoo.com> wrote:

> http://sanonofresafety.files.wordpress.com/2013/11/wasteconcommentsdgilmoresubmitted2013-12-19docketnrc-2012-0246.pdf
>
> Steven Sondheim

RulemakingComments Resource

From: StevenSondheim <StevenSondheim@yahoo.com>
Sent: Friday, December 20, 2013 7:02 PM
To: RulemakingComments Resource
Subject: Re: NRC Comment Correct link

Reference:
http://sanonofresafety.files.wordpress.com/2013/11/wasteconcommentsdgilmoresubmitted2013-12-19docketnrc-2012-0246.pdf

Steven Sondheim

On Dec 20, 2013, at 5:54 PM, StevenSondheim <StevenSondheim@yahoo.com> wrote:

Waste Confidence Comments Corrections in Red

Docket ID No. NRC–2012–0246

Position: Stop making nuclear waste for any number of reasons including a Lack of Waste Confidence

- Unless and until permanent isolation of the existing radioactive waste from the biosphere has been demonstrated, there should be no confidence in licensing waste production, and the NRC should stop licensing new reactors and relicensing old ones. The NRC does not have the authority to license making more waste ~~until it is PROVEN that~~ BECAUSE the waste canNOT be isolated from the biosphere.

  There is no current working process to isolate or remove radioactive waste of all levels from our biosphere. The NRC is too closely involved with the nuclear industry to make an objective decision regarding waste generation.

- There should be no more licensing or re-licensing of nuclear reactors ~~until the~~ FOR MANY REASONS INCLUDING THE FACTS THAT METHODS FOR permanent disposal AND ISOLATION of radioactive waste haVE NOT been determined, proven and funded.

  Why should we condone continued licensing of new reactors and renewing licenses from old reactors while we are facing the dilemma of not being able to safely dispose of the 70,000 metric tons of commercial high level nuclear waste already generated and the ~ 2000 metric tons being produced each year by nuclear power reactors in the US?

- The EIS should consider and analyze the option of not generating any additional waste. It should consider and evaluate phasing out nuclear reactors in the near future.

Creating additional waste when there is no identifiable solution for its permanent disposition cannot be justified.

- Any EIS regarding nuclear waste storage must first and foremost consider alternatives to nuclear waste generation.

  There are other methods of generating electricity that do not generate radioactive waste. Prevention and precaution are the responsibility of the NRC.

- The EIS must also compare the variety of possible methods for storing the more than 150,000 tons of highly radioactive irradiated/spent fuel that will be created and housed at nuclear power reactors by 2050.

  Overcrowding in irradiated/spent fuel pools is an unacceptable risk to the public. The NRC should take immediate action to reduce the number of fuel assemblies in the water filled pools, as well as analyzing the deficiencies of the current dry cask storage.

  New potentially less dangerous methods such as Hardened ON- Site Storage (HOSS) should be fully evaluated in the EIS.

  The storage and transport of high-burnup fuel must be fully evaluated in the EIS.

- The EIS needs to take into consideration environmental justice questions, such as who bears the burden and who reaps the benefits.

  Native peoples and peoples of color and those in poor communities have historically been disproportionately impacted by all links in the nuclear chain, from mining to radioactive waste dumping.

- The EIS must address reactor need for water and the consequences related to that use.

  Nuclear reactors use large amounts of water to cool the reactor and to keep the fuel pools stable. In California, the consequences of the enormous amount of water needed in the reactors for once through cooling were recognized. This led to concerns about dwindling water resources that resulted in state-wide mandates to reduce the amount of sea water being used by all energy plants.

  Water is a scarce commodity in many parts of the US. Global warming continues to decrease the river and lake levels needed to cool reactors. Having to shut down reactors while in the peak energy need of the hottest days of summer adds to the unreliability and safety issues of storing nuclear waste in fuel pools.

Water is needed in case of accident to prevent nuclear power cores and waste pools from overheating and melting, releasing enormous amounts of radioactivity into the air. We learned from Fukushima that that water has gotten contaminated and is still releasing into the Pacific Ocean over 2 years after the initiation of the triple meltdowns.

- The true costs of nuclear power should be assessed in detail in the EIS, including the substantial front end subsidies, and the long term costs of decommissioning and the management of nuclear

  Nuclear Reactor owners and operators are not fully financially responsible for disposal of their waste. Once the waste leaves the reactor site, the US taxpayer is on the line for any accidents and liability. These long term hidden costs must be made apparent, in full view and via "full cost accounting."

- The dangerous and unpredictable effects of global warming on all aspects of the nuclear industry must be taken into account.

  Nuclear power is not green. The chain of events that leads to the creation of nuclear fuel is very carbon intensive. The disposal and decommissioning of nuclear reactors is a carbon cost that is not often calculated into the footprint of reactors. Nuclear power routinely emits radioactive carbon. Sea levels are rising; extreme weather events are increasing in frequency; and catastrophic damage to nuclear stations becomes even more likely.

- All nuclear reactors and reactor sites are not created equal. A *generic* environmental impact statement for evaluating waste and waste storage at all reactors is an irresponsible and unscientific response to the challenges posed by long-term irradiated waste storage.

  Each reactor site has its own unique environment. Site issues can range from being close to large population centers, being in a flood plain and having seismic issues. A generic EIS cannot be a true picture of the impacts of the waste generation and storage of highly radioactive spent fuel. Because NRC *generically* ruled it had confidence that there would be a solution for high level nuclear waste, the dangers were never allowed to be considered at each site.

My Additional Comments

Generic Finding of NO CONFIDENCE.

Admission from both the nuclear industry and young nuclear engineers IS that the safe waste storage issue has not yet been solved. They promise to work on it with earnest. The public and the NRC can NOT go forward with

CONFIDENCE. ~~until s~~Solutions MUST BE SOUGHT ~~are found and verified~~ AND IMPLEMENTED FOR THE WASTE ALREADY PRODUCED. This is a reason for a generic finding of NO CONFIDENCE.

High BurnUp Fuel -The DGEIS must be redone.

Not fully evaluated in DGEIS and There is no determination of isolation from other waste, amount and location, or studies to address the problems.

Must stay 20 years in pools

Only 20 years in casks

No transport allowed

Reference:
http://sanonofresafety.files.wordpress.com/2013/11/wasteconcommentsdgilmoresubmitted2013-12-19docketnrc-2012-0246.pdf

There needs to be a Full EIS of any waste storage alternative, particularly Transport and CIS Sites before Waste Confidence can be assured.

Sincerely,

Steven Sondheim
Activist, Sierra Club Nuclear Free Campaign
Member, Chickasaw Group of the Tennessee Sierra Club

RulemakingComments Resource

From: StevenSondheim <StevenSondheim@yahoo.com>
Sent: Friday, December 20, 2013 6:57 PM
To: RulemakingComments Resource
Subject: Re: NRC Comment Corrections

Corrected link at the bottom.
Steven Sondheim

On Dec 20, 2013, at 5:54 PM, StevenSondheim <StevenSondheim@yahoo.com> wrote:

Waste Confidence Comments Corrections in Red

Docket ID No. NRC–2012–0246

Position: Stop making nuclear waste for any number of reasons including a Lack of Waste Confidence

- Unless and until permanent isolation of the existing radioactive waste from the biosphere has been demonstrated, there should be no confidence in licensing waste production, and the NRC should stop licensing new reactors and relicensing old ones. The NRC does not have the authority to license making more waste ~~until it is PROVEN that~~ BECAUSE the waste canNOT be isolated from the biosphere.

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RulemakingComments Resource

From: StevenSondheim <StevenSondheim@yahoo.com>
Sent: Friday, December 20, 2013 6:54 PM
To: RulemakingComments Resource
Subject: NRC Comment Corrections

Waste Confidence Comments Corrections in Red

Docket ID No. NRC–2012–0246

Position: Stop making nuclear waste for any number of reasons including a Lack of Waste Confidence

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