

Rulemaking1CEm Resource

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Attachments: Comment of Ed McArdle on behalf of Sierra Club Michigan Chapter received via mail.pdf

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SIERRA CLUB MICHIGAN CHAPTER

COMMENTS TO NUCLEAR REGULATORY COMMISSION

SUBMITTED TO PUBLIC HEARING CONCERNING THE WASTE CONFIDENCE DECISION AT Perrysburg, Ohio December 2, 2013

We all know there is no good final solution to the problem of creating nuclear waste that must be isolated from the environment and all living things for millions of years. If we ever come to a decision on a deep underground depository that would mean thousands of shipments moving through towns and cities endangering populations as they pass through and the likelihood of accidents. The highways, railways and watercourses would have to be militarized and shipments would have to be secretive to prevent terrorism. Even if a suitable place could be found; it would be decades before any waste would be interred. The proposed interim storage sites until a final solution is found makes no sense either. It would just double the shipments and exposure to accidents. This temporary solution would also take decades to implement.

Keeping the waste on site in dry casks also is not a good solution but seems the best alternative for now to moving the waste multiple times. Hardened with concrete the casks could be safe against most disasters and terrorism. For instance, the casks at Fukushima were undamaged. Of oourse, some sites are not appropriate for cask storage such as the Palisades nuclear station where they are placed on unstable sand dunes.

It should be realized that there is a special problem at Fermi 2. They are unable to transfer the radiated waste from the fuel pools to casks because of defects in the original construction. Meanwhile, the NRC continues to allow waste to be stored in the fuel pools way beyond the design capacity. There is now over 620 tons of the most dangerous

substances on earth stored in a pool five stories above. This is more irradiated fuel there than all the Fukushimas put together.

The most obvious and moral solution is to not make more waste in the first place especially since it is now not necessary. Nuclear electrical generation comprises only 20% of our power supply and there are now less expensive and safer alternatives. We should not as a civilization endanger generations far into the future. Nuclear waste is forever.

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