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TO: Rulemakings and Adjudications Staff

FROM: Sara Mikkelsen

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The U.S. Court of Appeals rejected the current Waste Confidence Rule noting that, after decades of failure to site a repository, the NRC "has no long-term plan other than hoping for a geologic repository." Therefore it is possible that spent fuel will be stored at reactor sites "on a permanent basis." The NRC must examine the environmental consequences of storing radioactive wastes at reactor sites into the indefinite future.

The NRC Draft Generic Environmental Impact Statement (GEIS) relies on the fundamentally flawed assumption that all reactor sites are the same. On the contrary, they each have unique geographic, environmental, geological, climactic, and epidemiological considerations. The creation of a one-size-fits-all plan is scientifically invalid.

(1) The Draft GEIS claims that the environmental impact of long-term or indefinite storage is small. This is an absurd statement on its face, given the known extreme hazards of radioactive wastes and the lack of any experience of storing these toxins for even a hundred years, let alone hundreds of thousands of years.

(2) The Draft GEIS claims that impact of a severe accident would be small. Such a conclusion cannot be supported by logic or experience. A severe accident would release deadly radioactivity into the environment. Every release of manmade radioactive matter into the environment to date has had serious and long-lasting impacts on humans and other living things within the area affected.

(3) The Draft GEIS assumes that the impact of terrorism would be small. However, according to the National Institute of Health, an attack on a nuclear reactor could result in a "massive release of radioactive material". In the aftermath of 11 September, David Kyd, spokesman for the International Atomic Energy Agency, confirmed this view, stating: "[Reactors] are built to withstand impacts, but not that of a wide bodied passenger jet full of fuel. . . . These are vulnerable targets, and the consequences of a direct hit could be catastrophic."

(4) Unrecognized in the Draft GEIS is the fact that no civilization and no human institutions have lasted for hundreds of thousands of years. Any credible plan must include ways to mitigate the risks of environmental contamination in the event of failure of governments or institutions. A realistic plan must be devised to keep manmade radioactive elements isolated from the biosphere for the million years the EPA declares them to be lethal.

For these reasons and many others, the Draft GEIS is not scientifically valid and remains no more than a hope.

