

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Wednesday, January 15, 2014 9:26 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: Late filed comments on Waste Confidence

DOCKETED BY USNRC—OFFICE OF THE SECRETARY  
SECY-067

PR#: PR-51  
FRN#: 78FR56775  
NRC DOCKET#: NRC-2012-0246  
SECY DOCKET DATE: 1/10/14  
TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel  
COMMENT#: 00921

-----Original Message-----

From: Marv Lewis [<mailto:marvlewis@juno.com>]  
Sent: Friday, January 10, 2014 10:52 AM  
To: CHAIRMAN Resource  
Subject: Late filed comments on Waste Confidence

From: Marvin Lewis  
To: Allison MacFarlane, Ph. D.  
Subject: Table S-3.

Dear Madame Chairman,

Table S-3, Summary of environmental considerations for uranium fuel cycle, contains errors and omissions that may rise to violations of NEPA and several other United States laws. I call your attention to the criticism of Walter H. Jordan, Ph. D., Administrative Law Judge in the TMI#1 Restart Hearings.

"Deaths in future generations due to cancer and genetic effects resulting from the radon from the uranium required to fuel a single reactor for one year can run into the hundreds. (See Pohl, Search, Vol.7 No. 8, Aug. 1976). It is very difficult to argue that deaths in future generations are unimportant."Memo for James Yore from W. H. Jordan, dated Sep. 29, 1977, Errors in 10 CFR 51.20, Table S-3.

I consider that this admission by an NRC staffer is very impactful as this is an admission of deaths not allowed into the cost benefit analysis and comes from a skilled member of the NRC staff. I request that the entire Table S-3 be re-evaluated to determine if the remaining data points are as deficient. I also request that the Comment Period for the Waste Confidence GEIS, Nureg 2157, be extended to include the time needed to reanalyze Table S-3 in light of the above deficiencies.

Respectfully submitted,  
Marvin Lewis

**Hearing Identifier:** Secy\_RuleMaking\_comments\_Public  
**Email Number:** 966

**Mail Envelope Properties** (377CB97DD54F0F4FAAC7E9FD88BCA6D0014435FE510D)

**Subject:** FW: Late filed comments on Waste Confidence  
**Sent Date:** 1/15/2014 9:26:24 AM  
**Received Date:** 1/15/2014 9:26:33 AM  
**From:** RulemakingComments Resource

**Created By:** RulemakingComments.Resource@nrc.gov

**Recipients:**  
"Rulemaking1CEm Resource" <Rulemaking1CEm.Resource@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	1750	1/15/2014 9:26:33 AM

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