

PRM-51-10  
(71FR64169)

**From:** "Sandra Gavutis" <gavutis@comcast.net>  
**To:** <SECY@nrc.gov>  
**Date:** Fri, Mar 2, 2007 3:31 PM  
**Subject:** Fw: A.G.'s petition to NRC

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DOCKETED  
USNRC

March 5, 2007 (3:15pm)

Subject: A.G.'s petition to NRC

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Secretary,

U.S. Nuclear Regulatory Commission,

Washington, DC 20555-0001

Attn: Rulemakings and Adjudications Staff.

RE: Docket No. PRM-51-10 - Support The Massachusetts Attorney General's Petition for Rulemaking-  
Spent Fuel I strongly support the Massachusetts Attorney General's Petition for Rulemaking in its entirety.

Specifically I support the conclusions that, the Nuclear Regulatory Commission should:

- (a) Consider new and significant information showing that the NRC's characterization of the environmental impacts of spent fuel storage as insignificant in the License Renewal GEIS is incorrect,
- (b) Revoke the regulations which codify that incorrect conclusion and excuse consideration of spent fuel storage impacts in NEPA decision-making documents,
- (c) Issue a generic determination that the environmental impacts of high-density pool storage of spent fuel are significant, and
- (d) Order that any NRC licensing decision that approves high-density pool storage of spent fuel at a nuclear power plant or any other facility must be accompanied by an EIS that addresses (i) the environmental impacts of high-density pool storage of spent fuel at that nuclear plant and (ii) a reasonable array of alternatives for avoiding or mitigating those impacts.

We know that this rule change is important to better protect our public health and safety. For example, simply look at the estimates of costs and latent cancers following the releases of Cesium-137 from Pilgrim's spent fuel pool prepared by Dr. Jan Beyea for the Massachusetts Attorney General Motion to Intervene in the Re-licensing Application for Pilgrim and Vermont Yankee, May 25, 2006.

Estimates of Costs and Latent Cancers Following Releases of Cesium-137 from Pilgrim's Spent-Fuel Pool

Consequence  
10% release C-137  
100% release C-137

Cost (billions)

Template = SECY-067

SECY-02

\$105-\$175 billion  
\$342-\$488 Billion

Latent Cancers  
8,000  
24,000

Sincerely,

Sandra Gavutis, Executive Director

C-10 Research and Education Foundatio

44 Merrimac Street, Newburyport, MA 01950

CC: <Matthew.Brock@ago.state.ma.us>

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**Creation Date** Fri, Mar 2, 2007 3:31 PM  
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