

PRM-51-10  
(71FR64169)

**From:** "Barbara Hildt" <barbara.hildt@verizon.net>  
**To:** <SECY@nrc.gov>  
**Date:** Fri, Mar 2, 2007 9:09 AM  
**Subject:** A.G.'s petition to NRC

22

DOCKETED  
USNRC

March 5, 2007 (3:15pm)

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

Template = SECY-067

SECY-02

**Consequence**

10% release C-137

100% release C-137

**Cost (billions)**

\$105-\$175 billion

\$342-\$488 Billion

**Latent Cancers**

8,000

24,000

Sincerely,

**Barbara Hildt**

19 Acadia Kimball Rd.

Amesbury, MA 01913

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

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