

PRM-51-10  
(71FR64169)

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**To:** <SECY@nrc.gov>  
**Date:** Sun, Mar 4, 2007 12:12 AM  
**Subject:** Rulemaking- Public Opinion

DOCKETED  
USNRC

March 5, 2007 (3:15pm)

Secretary, U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Attn: Rulemakings and Adjudications Staff.

Dear Mr. Secretary,

I wish to go on record as in support of the Massachusetts Attorney General's Petition for Rulemaking on Spent Fuel Storage. I believe that this is particularly important in decisions to relicense nuclear power plants with above ground, high-density spent fuel pools. Our citizens can no longer afford to allow this issue to be passed over in licensing renewals such as the one at the Pilgrim Nuclear Station, Plymouth, Massachusetts.

Plenty of studies have shown the dangers within the recent past. Terrorist attack strategies can be easily envisioned that result in partial or full drainage, or blockage of cooling capacity that will produce a major release of contaminants. Recent conclusions that spent fuel pools are insignificant or that their environmental impacts are insignificant are very wrong. These recent conclusions, being promulgated as regulations for relicensing review, need to be revoked. All NRC licensing decisions that approve high-density pool storage need to have an EIS directly assessing and resolving the environmental impacts of high-density pool storage of spent fuel at that nuclear plant, as well as alternatives for avoiding and mitigating the impacts.

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