

From: mblampert@verizon.net
To: <SECY@nrc.gov>
Date: Tue, Mar 6, 2007 10:03 AM
Subject: NRC Docket No. PRM-51-10 (Mass. Attorney General's Petition for Rulemaking)

Secretary, U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001
Attn: Rulemakings and Adjudications Staff
E-mail comments to: SECY@nrc.gov

RE: Docket No. PRM-51-10
Support the Mass. Attorney General's Petition for Rulemaking
Spent Fuel

Dear Sir or Madam:

I support the Massachusetts Attorney General's Petition for Rulemaking in its entirety. I specifically support the conclusions set forth in the Attorney General's Petition that the Nuclear Regulatory Commission ("NRC") should:

(a) Consider new and significant information that demonstrates that the NRC's characterization in the License Renewal EIS that the environmental impacts of spent fuel storage are "insignificant" is incorrect;

(b) Revoke the regulations that, codifying the NRC's incorrect conclusion indicated above, eliminate consideration of the impacts 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 the particular nuclear plant and (ii) a reasonable array of alternatives for avoiding or mitigating those impacts.

This rule change is important to better protect the Commonwealth's and the community's public health and safety. In the Massachusetts Attorney General's Motion to Intervene in the Relicensing Application for Pilgrim and Vermont Yankee (May 25, 2006), Dr. Jan Beyea estimated that a release of only 10% of the Cesium-137 in Pilgrim's spent fuel pool would cause \$105-\$175 billion in costs and 8,000 latent cancers, and a release of 100% of the Cesium-137 in Pilgrim's spent fuel pool would cause \$342-\$488 billion in costs and 24,000 latent cancers. By what standard can costs of nearly half a trillion dollars and 24,000 latent cancers be deemed to be "insignificant"? Clearly, spent fuel storage --- an environmental risk that only increases as time passes and more spent fuel is added to the storage pool --- is a material consideration in relicensing.

Signed,

Michael B. Lampert
Boston, Massachusetts

CC: <Matthew.Brock@ago.state.ma.us>, <senator@kennedy.senate.gov>, <john_kerry@kerry.senator.gov>, <william.delahunt@mail.house.gov>, <Michal.Freedhoff@mail.house.gov>, stephen.lynch@mail.house.gov

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