

**From:** Marilyn <marilyn@alabe.com>  
**To:** <Matthew.Brock@ago.state.ma.us>, <senator@kennedy.senate.gov>, <william.delahunt@mail.house.gov>, <john\_kerry@kerry.senator.gov>, <Michal.Freedhoff@mail.house.gov>, <Michal.Freedhoff@mail.house.gov>, <SECY@nrc.gov.>  
**Date:** Wed, Mar 7, 2007 10:40 AM  
**Subject:** RE: Docket No. PRM-51-10 – Support The Massachusetts Attorney General’s Petition for Rulemaking- Spent Fuel

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 Massachusetts Attorney General’s Petition for Rulemaking- Spent Fuel

(You/We) support the Massachusetts Attorney General’s Petition for Rulemaking in its entirety.

Specifically we 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)

\$105-\$175 billion

\$342-\$488 Billion

Latent Cancers

8,000

24,000

Signed,

Marilyn Harquail

**Mail Envelope Properties** (45EEDCDD.A4F : 21 : 23119)

**Subject:** RE: Docket No. PRM-51-10 – Support The Massachusetts Attorney General’s Petition for Rulemaking- Spent Fuel  
**Creation Date** Wed, Mar 7, 2007 10:40 AM  
**From:** Marilyn <marilyn@alabe.com>

**Created By:** marilyn@alabe.com

**Recipients**

nrc.gov.  
SECY

mail.house.gov  
Michal.Freedhoff  
william.delahunt

kerry.senator.gov  
john\_kerry

kennedy.senate.gov  
senator

ago.state.ma.us  
Matthew.Brock

**Post Office**

**Route**

nrc.gov.  
mail.house.gov  
kerry.senator.gov  
kennedy.senate.gov  
ago.state.ma.us

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	2048	Wednesday, March 7, 2007 10:40 AM
Mime.822	3480	

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**ReplyRequested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**Junk Mail Handling Evaluation Results**

Message is eligible for Junk Mail handling

This message was not classified as Junk Mail

**Junk Mail settings when this message was delivered**

Junk Mail handling disabled by User

Junk Mail handling disabled by Administrator

Junk List is not enabled

Junk Mail using personal address books is not enabled

Block List is not enabled