

**PRM-51-10  
(71FR64169)**

**DOCKETED 03/12/07**

**Comment No. 31**

**From:** "Rocky" <rockydux@gmail.com>  
**To:** <SECY@nrc.gov>  
**Date:** Fri, Mar 9, 2007 9:25 PM  
**Subject:** PRM-51-10

I am writing in regards to the importance that the NRC consider the spent fuel pool as an environmental hazard and great public health risk when considering a 20 year license renewal for the Pilgrim Power Station.

The NRC has allowed the spent fuel pool to be "double racked" which is a prime terrorist target because the loss of coolant could result in a catastrophic radioactive fire. This has been well researched by Mr. David Lochbaum of the Union of Concerned Scientists <http://www.ucsusa.org/news/experts/experts-at-ucs-david-lochbaum.html> and others. I can't think of bigger and higher risk environmental threat than a fire that is releasing Cesium 137 <http://www.epa.gov/radiation/radionuclides/cesium.htm> into the atmosphere and surrounding terrain.

There is also, as with anything, the risk of human error or mechanical failure that could have the same consequences. I believe all these environmental threats should be included in any analysis. There are ways of minimizing this risk that could be discussed if a review is allowed.

I urge you to do all that you can to see to it that this be considered in the NRC's re-license criteria.

Respectfully,

Richard C. DiPrima

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**Creation Date** Fri, Mar 9, 2007 9:24 PM  
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**Created By:** rockydux@gmail.com

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Mime.822	8685	

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