

Town of Duxbury, Massachusetts

March 13, 2007 (4:56pm)

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

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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Elizabeth H. Sullivan, Chair
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March 5, 2007

Secretary, U.S. Nuclear Regulatory Commission,
Washington, DC20555-0001
Attn: Rulemakings and Adjudications Staff.

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

Gentlemen:

We, the Board of Selectmen of the Town of Duxbury, 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 this 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

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The mission of the Town of Duxbury is to deliver excellent services to the community in the most fiscally responsible and innovative manner while endeavoring to broaden our sense of community and preserve the unique character of our town.

Template = SECY-067

SECY-02

- (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 believe that this rule change is very important to better protect the public health and safety of the Town of Duxbury and the Commonwealth.

Signed,


Elizabeth H. Sullivan
Chair


Andre Martecchini


John J. Tuffy

cc. Matthew.Brock@ago.state.ma.us