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DOCKETED
USNRC

March 16, 2007

March 19, 2007 (4:45pm)

Secretary, U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001
Attn: Rulemakings and Adjudications Staff.

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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

Dear Sir or Madame:

Greenpeace wholeheartedly supports the Massachusetts Attorney General's Petition for Rulemaking on Spent Fuel. Specifically we support the Attorney General's position that the Nuclear Regulatory Commission should:

- (1) Consider new and significant information showing that NRC incorrectly characterized the environmental impacts of spent fuel storage as insignificant,
- (2) Revoke the regulations that codify the incorrect conclusion and excuse the NRC's failure to consider spent fuel storage impacts in the licensing process,
- (3) Issue a generic determination that the environmental impacts of high-density pool storage of spent fuel are significant, and
- (4) 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: (a) the environmental impacts of high-density pool storage of spent fuel at that nuclear plant and (b) a reasonable array of alternatives for avoiding or mitigating those impacts.

Greenpeace believes that this rule change is necessary to protect the public health and safety. We also believe that there is significant new information since the attacks of September 11th that warrant this change. It is both a credit to the Commonwealth and an embarrassment to the NRC and congressional oversight that this proposed rule is even necessary more than 5 years later. The Commission should move expeditiously to ensure that the Commonwealth's proposed rule is promulgated.

Sincerely,

Jim Riccio
Nuclear Policy Analyst

Template = SECY-067

SECY-02

From: Jim Riccio <jim.riccio@wdc.greenpeace.org>
To: <SECY@nrc.gov>
Date: Mon, Mar 19, 2007 10:39 AM
Subject: Docket No. PRM-51-10

Dear Secy,

Greenpeace supports the Massachusetts Attorney General's Petition for Rulemaking on Spent Fuel. Please find our comments attached.

Sincerely,

Jim Riccio
Nuclear Policy Analyst
Greenpeace

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Mail Envelope Properties (45FEA099.AF3 : 12 : 15091)

Subject: Docket No. PRM-51-10
Creation Date Mon, Mar 19, 2007 10:37 AM
From: Jim Riccio <jim.riccio@wdc.greenpeace.org>

Created By: jim.riccio@wdc.greenpeace.org

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Mass AG SFP rulemaking.doc	39936	
Mime.822	57039	

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