

PRM-51-10  
(71FR64169)

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**From:** "Howard Hall" <hightide23@hotmail.com>  
**To:** <SECY@nrc.gov>  
**Date:** Mon, Mar 19, 2007 8:13 PM  
**Subject:** RE: Docket No. PRM-51-10.

DOCKETED  
USNRC

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

March 20, 2007 (9:11am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Attn: Rulemakings and Adjudications Staff

We support the Massachusetts Attorney General's petition for rulemaking regarding spent fuel and specifically its conclusions that the NRC should: (a) consider new and significant information which shows that the NRC's characterization of environmental impacts of spent fuel storage as insignificant in the License Renewal GEIS is incorrect, (b) revoke the regulations which codify that incorrect conclusion, (c) order that any NRC licensing decision that approves high-density pool storage of spent fuel at a nuclear plant or any other facility must be accompanied by an EIS that addresses the environmental impacts of high-density pool storage of spent fuel at that nuclear plant and alternatives for avoiding or mitigating those impacts.

This rule change is important to better protect our public health and safety. In fact, with Dr. Jan Beyea's conservative estimate that just a 10% release of Cesium-137 from Pilgrim could result in 8,000 latent cancers and \$100+ billion in costs, it is imperative that NRC rules reflect the latest and best scientific and environmental knowledge available. To do otherwise would be criminally negligent.

We look forward to your leadership in undertaking this rule change.

Sincerely,  
Judy and Howard Hall  
44 River Lane  
Duxbury, MA

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**CC:** <Matthew.Brook@ago.state.ma.us>

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**Creation Date** Mon, Mar 19, 2007 8:13 PM  
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