

PRM-51-10
(71FR64169)

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From: Robert Gould <rmgould1@yahoo.com>
To: <SECY@nrc.gov>
Date: Mon, Mar 19, 2007 10:47 AM
Subject: 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.
SECY@nrc.gov.

March 18, 2007

DOCKETED
USNRC

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

March 21, 2007 (4:28pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

The San Francisco-Bay Area Chapter of Physicians for Social Responsibility (SFPSR) supports the Massachusetts Attorney General's Petition for Rulemaking.

Specifically, SFPSR supports the Attorney General's position that the Nuclear Regulatory Commission should:

- (a) Consider new and significant information showing that NRC incorrectly characterized the environmental impacts of spent fuel storage as insignificant,
- (b) Revoke the regulations which codify that incorrect conclusion and excuse the NRC's failure to consider spent fuel storage impacts in the licensing process,
- (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 Massachusetts' public health and safety, and that new and significant information, e.g., the events of 9/11 and the President's statement that nuclear power plants are targets for terrorists, has evolved since the rule was written.

Template = SECY-067

SECY-02

Very truly yours,

Robert M. Gould, MD
President
SF-Bay Area Chapter
Physicians for Social Responsibility

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