



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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OFFICE OF THE
SECRETARY

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RULEMAKINGS AND
ADJUDICATIONS STAFF

MEMORANDUM TO FILE

FROM: Emile L. Julian *Emile L. Julian*
Assistant for Rulemakings
and Adjudications

SUBJECT: FORM COMMENTS SUBMITTED IN RESPONSE TO REQUEST
FOR COMMENTS ON PRM-51-10 (71FR 64169)

Attached is a representative sample of 1,602 identical e-mails submitted in response to the Federal Register Notice on PRM-51-10, the petition for rulemaking submitted by the Attorney General of Massachusetts to modify or revoke regulations concerning the storage of spent nuclear fuel in high-density fuel storage pools. Also attached is a list of persons who submitted identical e-mails.

Attachments: As stated

From: David Yao <davidc.yao@comcast.net>
To: <secy@nrc.gov>
Date: Thu, Mar 15, 2007 5:26 PM
Subject: Massachusetts Attorney General Petition for Rulemaking, Docket No. PRM-51-10

Attn: Rulemakings and Adjudications

I am writing in full support of the Massachusetts Attorney General Petition for Rulemaking (Docket No. PRM-51-10), which requests that the NRC evaluate the environmental impacts of severe accidents and intentional attacks on spent fuel storage in its licensing decisions. The NRC must also consider measures for mitigating these impacts.

The densely-packed spent fuel pools found at every reactor site are vulnerable to terrorist attack and severe accidents that could result in large radioactive releases and the contamination of vast areas. Recent studies make it clear that NRC's claim that a spent fuel fire is "highly remote" is simply incorrect. A 2006 study by the National Academies found that a terrorist attack could cause "considerable physical damage to a spent fuel storage facility" and that even the partial loss of water in a spent fuel pool could lead to a fire and the release radioactivity to the environment.

The Ninth Circuit Court decision in *San Luis Obispo Mothers for Peace v. NRC* concluded that the NRC must evaluate the environmental impacts of a terrorist attack on spent fuel storage in its licensing decisions. I am dismayed that the NRC would choose to ignore this decision outside of the Ninth Circuit. Not only did the court's decision clearly dismiss the NRC's claims that these impacts do not have to be considered in environmental reviews, the Supreme Court refused to hear the appeal. When faced with the same decision, the Department of Energy (DOE) properly decided to apply the decision across the entire country. The NRC must follow the DOE's lead and apply the Ninth Circuit decision to all of its licensing decisions across the country.

Sincerely,

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Mail Envelope Properties (45F9BA08.948 : 16 : 22856)

Subject: Massachusetts Attorney General Petition for Rulemaking, Docket No. PRM-51-10
Creation Date Thu, Mar 15, 2007 5:26 PM
From: David Yao <davidc.yao@comcast.net>
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Recipients

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Files	Size	Date & Time
MESSAGE	1782	Thursday, March 15, 2007 5:26 PM
Mime.822	2998	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
 This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
 Junk Mail handling disabled by Administrator
 Junk List is not enabled
 Junk Mail using personal address books is not enabled
 Block List is not enabled

PRM-51-10	71FR64169	Total: 1,602
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