

**NRCREP - Public Comment, Attention James R. Hall**

**From:** "Betty McElhill" <bmcelhil@slonet.org>  
**To:** <NRCREP@nrc.gov>  
**Date:** 06/28/2007 7:47 PM  
**Subject:** Public Comment, Attention James R. Hall

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To: NRCPEP

Attention: James R. Hall

Public Comment: NRC (Public Meeting in San Luis Obispo, CA on January 26, 2007) safety/environmental evaluation of high-level nuclear waste storage at Diablo Canyon Plant in event of terrorist attack.

At the meeting, NRC reported their evaluation of the exposure of the public to radiation in the event of a terrorist attack on the nuclear waste storage (dry storage or including wet storage also??) facility at Diablo Canyon would be below 5 rems, which is the maximum annual dose allowed workers. This value is inadequate to describe the dangers to the health of the public and even more so to those persons on site or close by at the time of a major attack. I am concerned that not all potential dangers to public health have been included in the evaluation. Some of these dangers are as follows.

\* You are aware of the radioactivity of spent fuel.: "Ten years after the removal of spent fuel from a reactor, the radiation dose 1 meter away from a typical spent fuel assembly exceeds 20,000 rems per hour." (page 7 in Radioactive Waste: Production, Storage, Disposal, NUREG/BR-0216, Rev.2, May 2002). Explosions from a terrorist attack can blow hunks of spent fuel, now unshielded, great distances. They will not be labeled "Danger" and plant workers, emergency response teams and the public approaching them will be in danger of receiving high doses of radiation in very short exposure times. Some hunks will land in the ocean and others will be buried making timely recovery difficult. It would be impossible to declare land and beaches in the area safe for humans.

\* Explosions disintegrate and pulverize materials. Dust can travel long distances. Specially designed masks/respirators, not available to the public, are required to block inhalation of the tiny particles present.

\*\*Recent reports of illness caused by inhalation of dust by civilians living near (but not participating in the clean-up of) the World Trade Center on 9/11 have shown that the dangers to health of inhaled dust have been underestimated. That dust was from building materials, and probably did not contain significant amounts of radioactive elements.

\*\*Greater dangers are present in dust from radioactive materials. Even alpha emitters, whose radiation can easily be blocked externally, become imbedded in organs when inhaled and then continually emit radiation to damage adjacent tissues. Detection of inhaled alpha emitting materials requires special detection procedures, only recently developed. Evidence from tests on seriously ill American military personnel exposed to depleted uranium dust from exploded depleted uranium clad ammunition and bombs indicate particles remain in the body for long periods. Radioactivity has been detected in their urine years after exposure to the dust. As you are aware, spent fuel has higher and more diverse radioactive components than depleted uranium.

\* Particles and dust from the explosion will contaminate soil and water, becoming a potential source for ingestion by animals and humans. The chemical toxicity of uranium adds another health hazard.

Submitted by:

Betty McElhill

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Cdd = J. Hall (JRH)

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06/29/2007

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