

Rulemaking Comments

From: Diane D'Arrigo [dianed@nirs.org]
Sent: Wednesday, November 12, 2008 8:34 AM
To: Rulemaking Comments; CHAIRMAN Resource; CMRSVINICKI Resource; CMRLYONS Resource; CMRJACZKO Resource; Neil Jensen
Subject: EXTENSION REQ to NRC re Waste Confidence Decision 10CFR51 [Docket ID-2008-0482]; 73FR59551, 10-9-08)+Fuel Storage After Reactor Cessation 10CFR51, RIN: 3150-AI47, [NRC-2008-0404] 73FR59547, 10-9-08
Attachments: WASTE CONFIDENCE ext req letter Nov 12.doc

To: the US Nuclear Regulatory Commission, Washington, DC 20555

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DOCKETED
USNRC

November 12, 2008 (11:30am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

From: Multiple Organizations and individuals listed below

Contact: Diane D'Arrigo Nuclear Information and Resource Service
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Date: November 12, 2008

RE: Request to NRC to EXTEND for 3 months the Public Comment Period on
 ▶ Waste Confidence Decision and
 ▶ Consideration of Irradiated Fuel Storage at Closed Reactors

The organizations below call on the US NRC to provide additional time for the public to comment on proposed

Waste Confidence Decision Update (10 CFR Part 51 [Docket ID-2008-0482]; 73 FR 59551, 10-9-08)
<http://edocket.access.gpo.gov/2008/pdf/E8-23381.pdf> and

Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation <http://edocket.access.gpo.gov/2008/pdf/E8-23384.pdf>
(10 CFR Part 51, RIN: 3150-AI47, [NRC-2008-0404] 73 FR 59547, 10-9-08)

We request that NRC extend the comment periods for 90 additional days beyond the December 8, 2008 deadline for both of these high level radioactive waste/irradiated (spent) nuclear fuel proposals published in the Federal Register October 9, 2008. Both of the NRC's proposals make assumptions that have legal, regulatory, environmental, economic, health, safety, security, moral, genetic and philosophical significance. In order to have a meaningful opportunity to comment on the proposals and their underlying assumptions, and thereby ensure that the NRC complies with the National Environmental Policy Act in evaluating the environmental impacts of high-level radioactive waste disposal, the undersigned organizations require additional time to evaluate the claims and assumptions made in the proposals.

The last time the NRC published anything more than a cursory review of the Waste Confidence determination was 1990 in 55 Fed. Reg. 38474 (September 18, 1990). In the proposed revision of waste confidence Findings 2 and 4, the NRC has made some critical and complex judgments that are very different than the judgments made in support of Findings 2 and 4 in the 1990 Waste Confidence rule. It will take considerable time to study the NRC's judgments and make informed comments on them in a manner that would promote public discourse and better decision-making.

The proposed Waste Confidence rule raises important technical and policy questions that demand a significant amount of research and analysis – far more than can be accomplished in 60 days. For instance, the NRC has cited the history of repository programs in various countries as justification for its confidence that “sufficient mined geologic repository capacity can reasonably be expected to be available within 50–60 years beyond the licensed life for operation (which may include the term of a revised or renewed license) of any reactor...” The NRC has cited programs from the UK, Sweden, Finland, Switzerland, Canada, and Germany as part of the basis of its conclusion. The history of these programs is complex and involved, and more than 60 days is required to do the level of research and analysis necessary to determine whether the NRC has correctly interpreted the history of these programs.

While the NRC does not rely on the idea that the capacity of Yucca Mountain will be increased, it provides no technical basis that would indicate that such an increase in capacity could be accommodated within the final EPA dose limits. Public comment on this issue requires some time to address the various complexities, especially in view of the fact that the EPA final rule has only recently been published.

As another example, the NRC has made assumptions about legislative actions in arriving at its proposed text for Findings 2 and 4. The basis for these assumptions is not clear. It will require a study of the legislative and regulatory history of the U.S. repository program, including the history of the NWPA and the PFS program to address.

Finally, the proposals impact communities with existing and new nuclear power reactors, existing and proposed reprocessing facilities, high level waste storage and disposal facilities as well as existing and proposed transportation routes between these facilities. As organizations involved in public education on nuclear issues and as organizations concerned about nuclear safety and the environment, we believe that 60 days is entirely insufficient for us to be able to inform the public about the proposed changes and seek their input. This problem has become even more complex in the last year, since there are now proposals for almost three dozen new reactors, spread from East to West and potentially for new reprocessing facilities.

NRC is required to responsibly regulate and manage nuclear waste, which will remain dangerous for literally millions of years. Given the significant and long-lasting character of the risk, given the NRC's unique role in managing that risk, and given that the NRC's determinations may be used to justify the construction and operation of an entire new generation of nuclear power plants, it is critical that the public be given a sufficient amount of time to analyze and respond to the issues raised by these two proposals. We respectfully submit that an extension of time of three months is the minimum amount of time required in order to provide a meaningful opportunity to comment on the proposals.

Sincerely,

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Arizona Safe Energy Coalition
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(148.184.200.145) with Microsoft SMTP Server id 8.1.291.1; Wed, 12 Nov 2008
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X-MS-TNEF-Correlator:
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X-ExchangeDefender-Info: Please contact the ISP for more information
X-ExchangeDefender-VirusScan: Found to be clean
X-ExchangeDefender-From: dianed@nirs.org
X-Spam-Status: No
Return-Path: dianed@nirs.org