

## Rulemaking Comments

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**From:** Diane D'Arrigo Nuclear Information and Resource Service [dianed@nirs.org]  
**Sent:** Friday, February 06, 2009 11:41 PM  
**To:** Rulemaking Comments  
**Subject:** NIRS Supplemental Comments

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Nuclear Regulatory Commission

**PR 51**  
**(73FR59547)**  
**(73FR59551)**

Rockville, MD  
US

Dear Nuclear Regulatory Commission,

Re: 73 FR 197 -- 10/09/2008  
Docket ID?2008?0482 and Docket ID-2008-0404

Nuclear Information and Resource Service (NIRS) Supplemental comments on 10 CFR Part 51 RIN: 3150?AI47 [NRC?2008?0404] Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation and 10 CFR Part 51 [Docket ID?2008?0482] Waste Confidence Decision Update and proposed revision of Waste Confidence Decision

This is to clarify that NIRS supports a comprehensive Environmental Impact Statement (EIS) on the entire nuclear power fuel chain including reevaluation of Table S-3 (10 CFR 51.51), Table of Uranium Fuel Cycle Environmental Data. Table S-3 is (mis)used in most of the NRC's determinations regarding the significance (or lack of significance) of radiation releases, exposures, doses, dose rates and dose calculations at every step of the fuel chain from mining to final radioactive waste management and disposal. We are calling for this reassessment, with meaningful opportunity for public and independent expert input, for every step of fuel chain including production, management, treatment, storage, processing, deregulation and release, and disposal of so-called "low-level" radioactive waste.

Applications for new nuclear reactors should be required to assess the environmental, economic, health, safety, security and all other consequences of the radioactive waste (of every level and class) generated remaining at the site in the absence of offsite disposal. In addition the consequences of transportation and final disposal and routine releases all along the fuel chain need to be included in this comprehensive EIS.

Diane D'Arrigo  
NIRS Radioactive Waste Project Director  
Feb 6, 2009

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