From: Vernon Huffman [kashimbi@earthlink.net]
Sent: Tuesday, February 03, 2009 3:39 AM
To: Rulemaking Comments
Subject: Public Confidence in the NRC Would Be Strengthened By Nuclear Waste Realism and Compliance With the National Environmental Polic

Nuclear Regulatory Commission

Rockville, MD
US

Dear Nuclear Regulatory Commission,

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

Public Confidence in the NRC Would Be Strengthened By Nuclear Waste Realism and Compliance With the National Environmental Policy Act

In my opinion, the government should move to stop production of nuclear waste wherever possible and to glassify existing waste for monitored, retrievable storage on a geologically stable site.

The siting and licensing of new nuclear power reactors is a major federal action, and it is appropriate for the NRC to conduct a site-specific Environmental Impact Statement process under NEPA for each of these licensing actions. However, as NRC revisits its "Waste Confidence Decision," it is fundamental to a rational discussion that the proposed operation of additional nuclear power reactors in the USA be included, as additional reactors would necessarily result in the generation of more radioactive waste in the USA. The NRC has previously identified high-level radioactive waste generation as a generic issue, therefore it is appropriate that any major federal action on radioactive waste (such as changing the Waste Confidence Decision) be considered in a generic (programmatic) NEPA proceeding. Such an inquiry must include all aspects of the nuclear fuel chain -- since the decision to site and license new nuclear power reactors triggers not only more radioactive waste generation at nuclear power reactor sites -- it also triggers new radioactive waste generation at every point in the fuel chain starting with the mining of uranium, through the many processing steps (milling, conversion, enrichment, conversion, fuel fabrication) and all the transportation links in between. The impact to workers, nearby residents, communities, our environment and the consideration of alternatives to these impacts must be included in this impact analysis. For too long the true costs of our energy production have been labeled "externalities" and not factored in energy decisions. It is time that the full scope of the radioactive legacy of nuclear energy be included in Federal decision-making.

NRC has repeatedly expressed its "confidence" in the eventual permanent "disposal" of radioactive waste -- however the expectation that "disposal" will prevent release of this material into our environment has so far not been supported by any proposed program. The Yucca Mountain site would, according to federal agency projections, leak. The guidelines and regulations have been changed repeatedly to accommodate and "validate" this failure such that it is "acceptable." All the so-called "Low-Level" radioactive waste dumps dating back to the 1960's have leaked, and there is zero confidence that the existing regulations will keep any newer dump from leaking. This history of atomic waste policy does not inspire pubic confidence in the federal agencies mandated to "solve" the nuclear waste problem. Further, dry cask storage technology, upon which the Commission rests its immediate confidence, is a sorely insecure disposition for this most concentrated of dangerous wastes. Poor design, poor quality control, in some cases faulty fabrication, have created the equivalent of a rocket that cannot land. Overall lack of security and monitoring have left reactor communities extremely vulnerable, even as they are being told that the casks are a basis for "confidence." I am writing to urge nuclear waste realism: the NRC should suspend all generation of atomic waste from new sources unless

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and until a truly permanent program that is scientifically sound and rooted in a just and equitable siting/decision process is instituted. I also support a NEPA analysis of the issues associated with wastes generated at every step in the fuel chain, prior to any federal action.

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