

Rulemaking Comments

**From:** J Rauch [jm\_rauch@yahoo.com]  
**Sent:** Thursday, February 05, 2009 5:40 PM  
**To:** Rulemaking Comments  
**Subject:** Federal Register Notice 73 FR 197

U.S. Nuclear Regulatory Commission

Re: 73 FR 197 -- 10/09/2008  
Docket ID-2008-0482 and Docket ID-2008-0404  
Waste Confidence Decision

The siting and licensing of new nuclear power reactors is a major federal action, and as such it is appropriate for the NRC to conduct a site-specific Environmental Impact Statement process under NEPA for each of these licensing actions. Since the NRC has previously identified high-level radioactive waste generation as a generic issue, it is essential that this major federal action on radioactive waste, ie changing the Waste Confidence Decision be subjected to public review in a generic (programmatic) NEPA proceeding.

Also, as NRC revisits its "Waste Confidence Decision," it is fundamental to a rational NEPA review 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. 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 but 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.

Irrationally, many of the most significant costs of our energy production have been cavalierly ignored (so-called "externalities") and not factored into energy decisions. It is time that the full scope of the radioactive legacy of nuclear energy be included in Federal decision-making.

The history of US atomic waste policy does not inspire public confidence in the federal agencies mandated to "solve" the nuclear waste problem. Dry cask storage technology, upon which the Commission rests its immediate confidence, is far from an adequately secure disposition for this most concentrated and dangerous of radioactive wastes.

Overall, insufficient security and monitoring have left reactor communities extremely vulnerable, even as they are being told that the casks are a basis for "confidence."

Thank you for your consideration of these comments.

James Rauch  
73 Koster Row  
Snyder, NY 14226

Received: from mail1.nrc.gov (148.184.176.41) by TWMS01.nrc.gov  
(148.184.200.145) with Microsoft SMTP Server id 8.1.291.1; Thu, 5 Feb 2009  
17:40:08 -0500

X-Ironport-ID: mail1

X-SBRS: 5.6

X-MID: 35476172

X-IronPort-Anti-Spam-Filtered: true

X-IronPort-Anti-Spam-Result:

AmkBAFT5ikiCo7KcnGdsb2JhbACCcZFBAQEBAQEICwgJEatsCI8IBQIBhBMGgzw

X-IronPort-AV: E=Sophos;i="4.37,388,1231131600";

d="scan'208";a="35476172"

Received: from web34407.mail.mud.yahoo.com ([66.163.178.156]) by  
mail1.nrc.gov with SMTP; 05 Feb 2009 17:40:09 -0500

Received: (qmail 59820 invoked by uid 60001); 5 Feb 2009 22:40:07 -0000

DomainKey-Signature: a=rsa-sha1; q=dns; c=noFWS;

s=s1024; d=yahoo.com;

h=X-YMail-OSG:Received:X-Mailer:Date:From:Reply-To:Subject:To:MIME-Version:Content-Type:Message-ID;

b=aOojqeXgY6YbxyFTsa5eSmsZVYgZX172DdOQqKNEnP6sJ7ywtRIDAA0CrtWImI5Gq8YWrc  
4HYo6W7NArxXJ3/2EQumyGcB0F5Xxzz2etjfu7cRM8oSMI6N/Kim4HSbg+GgnqP0GFq5xMxm  
nealYsGpg5wQ6Q4X8JEglb3PIQSo=;

X-YMail-OSG:

s3CLAOkVM1n6RccdcgkYOPJqx4vrC1rzF25x99IAGkH7Nig8zhZJs1pjgHmaq0QXYWJYdp.xM  
JdgA30J6P5MG68O1WrD9QSy77mTHKvhAqzLP8V\_iB0Lh.ISCr5UhaG8G8YabH4nA\_vU1iFztt  
3xbkBNedcSiys0.u\_ENzmFGdrgQ--

Received: from [71.126.31.244] by web34407.mail.mud.yahoo.com via HTTP; Thu,  
05 Feb 2009 14:40:07 PST

X-Mailer: YahooMailWebService/0.7.260.1

Date: Thu, 5 Feb 2009 14:40:07 -0800

From: J Rauch <jm\_rauch@yahoo.com>

Reply-To: jm\_rauch@yahoo.com

Subject: Federal Register Notice 73 FR 197

To: rulemaking.comments@nrc.gov

MIME-Version: 1.0

Content-Type: multipart/alternative;

boundary="0-2021103688-1233873607=:57728"

Message-ID: <513805.57728.qm@web34407.mail.mud.yahoo.com>

Return-Path: jm\_rauch@yahoo.com