

Rulemaking Comments

**PRM-72-6
(74FR09178)**

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From: Site Administrator [action@ucsusa.org] on behalf of Thomas Krohmer
[toxicreverend@gmail.com]
Sent: Friday, May 15, 2009 2:58 PM
To: Rulemaking Comments
Subject: Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)

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USNRC

May 15, 2009

June 18, 2009 (2:29pm)

Nuclear Regulatory Commissioners

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Commissioners,

I am writing to encourage the NRC to take steps to increase the security and safety of nuclear waste stored at civilian nuclear reactor sites, which remains unacceptably vulnerable to a terrorist attack or accident.

The very basis of the epidemiology reports concerning radiation were "skewed" because researchers "thought" that they were comparing data from such experimenters as the Hanford Project with the data of the general public that they thought did not have any source of radiation exposures.

My father, Russell Jr. and Jack were close.

Of which is why I recall that Jack Krohmer was a cigarette smoker.

Being that Jack Krohmer was one of the leading authorities of the effects of radiation on humans and US Surgeon General C Everett Koop stated on national television in 1990 that tobacco radiation is probably responsible for 90% of tobacco-related cancer, one conclusion is evident.

The very basis of the epidemiology reports concerning radiation are "skewed".

It's likely that the Bush administration also had a hand in blocking the release of a 2001 World Health Organization (W.H.O.) paper on the effects of D.U.

The monograph was the work of Dr. Keith Baverstock, the W.H.O.'s top radiation expert for 11 years. In 2004, after his retirement, Baverstock charged that the W.H.O. had suppressed his study.

He told the London Sunday Herald that "...the widespread use of depleted uranium weapons in Iraq could pose a unique health hazard to the civilian population. There is increasing scientific evidence that radioactivity and the chemical toxicity of D.U. causes more damage to human cells than is assumed." [59] Later, in a BBC interview Baverstock described D.U. as "a potentially dangerous carcinogen." He also hinted that political interference had prevented his paper from being released in 2001.[60] The doctor emphasized that his report, had it not been suppressed, would have increased pressure on the U.S. and its U.K. ally to sharply limit their use of D.U. weapons in Afghanistan and Iraq.

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In reference;;

60. BBC Press Release:

"U.S. and U.K. military continued to use depleted uranium weapons despite cancer warnings,"
October 10, 2006.

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More specifically, I urge you to support a rule change that would strengthen the protection of nuclear waste stored in dry casks against foreseeable threats, such as sophisticated terrorist attacks, which might emerge over the next several decades. Please accept provision

(11) of the rulemaking petition submitted by the C-10 Research and Education Foundation, which outlines this change.

Those upgrades could include a combination of physical measures, such as putting spent fuel casks into enclosed buildings, using earthen

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embankments or other barriers, and other measures such as insuring that intruders will be denied access to independent spent fuel storage installations.

In addition, the current practice of allowing the rods to be stored in wet pools where they are densely packed together poses a dangerous

security risk. In the absence of a place to permanently store the waste underground, the NRC should require plants to promptly transfer spent

fuel from the pools to dry casks as soon as the fuel has cooled enough.

This would reduce the likelihood of a spent fuel fire due to accident or terrorist attack and the amount of radioactive material that could be released by such a fire.

Sincerely,

Mr. Thomas Krohmer
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