

**From:** [Iyengar, Raj](#)  
**To:** [Arce, Jeannette](#)  
**Subject:** FW: Comment on Docket ID NRC-2010-0267  
**Date:** Thursday, July 07, 2011 12:53:50 PM

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**From:** Rulemaking Comments  
**Sent:** Thursday, July 07, 2011 12:53 PM  
**To:** Iyengar, Raj; Sulima, John  
**Subject:** FW: Comment on Docket ID NRC-2010-0267

#### [Comment No. 9](#)

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**From:** Jean Blackwood [mailto:[jeanablackwood@yahoo.com](mailto:jeanablackwood@yahoo.com)]  
**Sent:** Wednesday, July 06, 2011 6:04 PM  
**To:** Rulemaking Comments  
**Subject:** Comment on Docket ID NRC-2010-0267

Re: Comment on Docket ID NRC-2010-0267

On June 10, 2011, the NRC published in the Federal Register the latest notice concerning development of regulations for future facilities engaged in the reprocessing of spent, or irradiated nuclear fuel. This comment is in response to that notice and is being submitted for the record.

Reprocessing creates a plethora of hard-to-manage radioactive waste streams, including high-level waste, Greater-than-Class-C waste, low-level waste, noble gases, contaminated uranium, and weapons-usable plutonium. These waste streams are more difficult to manage and isolate from the biosphere than the original irradiated fuel and it creates a greater volume with no reduction in radioactivity. We support containment and isolation of radioactivity from the environment but reprocessing achieves the opposite result, with a higher economic cost than managing spent fuel via Hardened On-Site Storage (HOSS).

Reprocessing must not be described as recycling. Given the waste streams generated via reprocessing which have no potential use whatsoever it is incorrect and misleading to call it recycling. Any draft definitions by the NRC must reflect reality and not a greenwashing term favored by some in the nuclear industry

We are opposed to the development of regulations for reprocessing plants because there is no need to develop regulations for facilities that will be highly unlikely to ever exist. We support a decision by the Commission to not proceed to rulemaking for regulations that are not needed and for which no urgency has been established. This process should be terminated when the staff concludes its work in September. The recommendations by the Blue Ribbon Commission are likely to affirm that reprocessing is unlikely to exist until far in the future, at which time

any rules drawn up today will be outdated.

We oppose any consideration of a one-step licensing process for reprocessing plants as this approach not only would be applied to speculative and untested reprocessing and associated technologies but also would reduce public opportunity for involvement in the licensing process.

. Previous attempts at reprocessing in the UK, Russia, France and at West Valley New York have ranged from abysmal to disastrous. Any future permission to allow reprocessing would have to guarantee that the company involved would pay all potential clean-up costs in the event of an accident.

. The setting of new reprocessing standards at this time serves no purpose toward protecting or serving the American people, but does serve the interests of French state company Areva, which is seeking a foot in the door.

. Plutonium fuel or MOX -- the product of commercial reprocessing -- is much more dangerous, harder to control in a reactor than uranium fuel and twice as deadly compared to uranium in case of a major reactor accident. There is no established national policy to use plutonium fuel on a wide-spread commercial basis and the Department of Energy's MOX program is facing many hurdles as no reactors have been identified to use the fuel .

We ask that the NRC to do a full-scale analysis under the National Environmental Policy Act (NEPA) before embarking on any rulemaking. The overall consequences of reprocessing and associated facilities and processes as it relates to the entire nuclear fuel cycle should be carefully considered first- everything from the dangers of more plutonium in the US and its vulnerability to terrorist attack, to the effects of a minor or a catastrophic on the health of people, land, and water, to the costs of such a program that would almost certainly, like most nuclear programs, be born doubly by those who are taxpayers and ratepayers.

Thank you for this opportunity to comment.

Jean Blackwood, Secretary  
Missourians for Safe Energy