

**From:** [Iyengar, Raj](#)  
**To:** [Arce, Jeannette](#)  
**Subject:** FW: Comment on Docket ID NRC-2010-0267, NRC "Draft Regulatory Basis for a Potential Rulemaking on Spent Nuclear Fuel Reprocessing Facilities"  
**Date:** Thursday, July 07, 2011 12:54:24 PM

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-----Original Message-----

From: Rulemaking Comments  
Sent: Thursday, July 07, 2011 12:54 PM  
To: Iyengar, Raj; Sulima, John  
Subject: FW: Comment on Docket ID NRC-2010-0267, NRC "Draft Regulatory Basis for a Potential Rulemaking on Spent Nuclear Fuel Reprocessing Facilities"

Comment No. 11

-----Original Message-----

From: patbirnie@greenbicycle.net [<mailto:patbirnie@greenbicycle.net>]  
Sent: Thursday, July 07, 2011 11:39 AM  
To: Rulemaking Comments  
Subject: Comment on Docket ID NRC-2010-0267, NRC "Draft Regulatory Basis for a Potential Rulemaking on Spent Nuclear Fuel Reprocessing Facilities"

GE Stockholders Alliance  
5349 W. Bar X Street, Tucson, AZ 85713-6402  
Patricia T. Birnie, Chair; 520-661-9671 patbirnie@greenbicycle.net

July 7, 2011

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attn: Rulemaking and Adjudications Staff

Rulemaking.Comments@nrc.gov

Re: Comment on Docket ID NRC-2010-0267, NRC "Draft Regulatory Basis for a Potential Rulemaking on Spent Nuclear Fuel Reprocessing Facilities"

Dear Sir and Commissioners:

We urge the NRC to place a hold on ALL actions of rulemaking and license approvals or license extensions until a thorough analysis of the Fukushima reactor catastrophe is conducted. It is wise to defer actions that may later need to be revised as new facts are learned from that tragedy.

Regarding possible rulemaking on irradiated nuclear fuel reprocessing:

# International nuclear weapons proliferation must be a primary issue for discussion of this proposed rulemaking since plutonium is a product of reprocessing. If we are serious about halting the spread of nuclear weapons, does it make sense to enable the production of plutonium?

# We doubt there is a NEED for reprocessing of irradiated nuclear fuel. Currently the Russians have inventories of plutonium that are useless, products of their reprocessing. U.S. history of attempting reprocessing was a miserable failure that contaminated a huge area that has still not

been cleared up even though that operation supposedly closed in 1972. Other countries that have tried reprocessing have also experienced dismal failure.

# Mixed Oxide Fuel (MOX) is produced by reprocessing. However its use in reactors is much more dangerous than uranium fuel, and much harder to control. It also has more toxic and carcinogenic properties. No policy guidelines exist for its use in U.S. reactors, so this is another example of how useless reprocessing would be.

# It is unwise to even consider a one-step licensing process since the technology for reprocessing is still at the design stage, and new innovations may require such complicated components that the one-step license would not catch irregularities or poor design glitches. Potential licensing becomes further complicated when some of the interested parties are foreign-owned interests.

# While reprocessing has been promoted as a responsible way to reduce radioactive waste, the fact is that reprocessing actually INCREASES the variety of toxic waste streams into forms more difficult to manage than Hardened On-Site Storage (HOSS) with the original irradiated fuel rods. Reprocessing would be more expensive and would cause side streams of contamination. The resulting products are still of no value. Why enable something that has no worth?

# It is incorrect and misleading to call Reprocessing "Recycling."

# We urge the NRC to provide multiple opportunities for public comment and review during each level of licensing procedures. We are convinced that there will be a higher degree of safety involved, the more the public is involved in reviewing rulemaking and licensing processes.

# For the immediate future the most important task for the nuclear industry must be to isolate the eligible existing irradiated fuel rods via Hardened On-Site Storage. This is particularly imperative at reactor sites where the fuel pools have had irradiated fuel assemblies re-racked to accommodate far more hot assemblies than the pools were originally designed. Some of those sites do not have reliable emergency backup power supplies, further exacerbating the danger at these sites.

Common sense would suggest that there should be an immediate industry-wide moratorium on the generation of new radioactive waste from all sources until a long-term technology is functioning that can safely isolate radioactive waste from the public. And that does not mean reprocessing.

Thank you for this opportunity to comment.

Patricia Birnie  
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