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DOCKETED
USNRC

Steering committee

July 13, 2011 (3:35 pm)

Chesapeake Physicians for Social Responsibility

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

1817 Sulgrave Ave.

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Baltimore, Maryland 21209

July 7, 2011

Secretary

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Attn: Rulemakings and

Adjudications Staff

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

- We oppose the development of regulations for reprocessing plants as reprocessing is a dangerous technology that lacks a societal benefit justifying the danger. We support a decision by the Commission to not proceed to rulemaking for regulations that will be in all likelihood inadequate in the time allowed given the complex task. The recommendations by the Blue Ribbon Commission should affirm that adequate rule-making cannot be established at this time or in the time allowed.

Template = SECY-067

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- We opposed considering a single step licensing process for reprocessing. Given all that could take place at a reprocessing complex – including spent fuel storage in dry casks and in pools, reprocessing, waste management and disposal, noble gas capture and containment, materials storage, and fuel fabrication – a single set of new regulations will be both insufficient to cover all possible functions and processes.

- Reprocessing will lead to a larger volume of more dangerous waste than we are creating presently with nuclear power generation. Waste streams will be more difficult to manage and isolate from the biosphere than the original irradiated fuel and create a greater volume with no reduction in radioactivity. We support containment and managing spent fuel via Hardened On-Site Storage (HOSS). Reprocessing will leave us with more dangerous waste which will be more difficult to isolate from the environment, the workforce and the people who live in the environs.

- Reprocessing is not recycling. It is taking a dangerous waste product and making it more abundant. We hope that the Blue Ribbon Commission does not use the term either recycling or green to describe reprocessing.

- The NRC should know that reprocessing in the United Kingdom has been a terrible failure, that Russia continues reprocessing with no use of separated plutonium, that all European

countries have now withdrawn from reprocessing in France and that France reuses little of the contaminated uranium removed via reprocessing, and that the \$20 billion Japanese reprocessing plant Rokkasho has failed to start after more than two years of attempts. The only previous U.S. experience with commercial reprocessing at West Valley, New York from 1966-1972 was a total failure which contaminated the environment and resulted in a multi-billion dollar clean-up program that is still proceeding, revealing that the NRC must guarantee that all costs of operation, clean-up and potential accidents must be must be guaranteed by license holders.

- The NRC would be setting National policy by rule-making regarding reprocessing. Presidents from both parties have opposed separation of plutonium from civilian radioactive waste . The NRC's writing new rules for plutonium separation in the near term would be "playing into the hand" of those who do seek to set national policy including foreign interests (AREVA and the French government of which it is an arm) who would benefit economically, while placing greater liability on the US taxpayer and electric power customers in the USA. These interests must also be prevented from dictating U.S. policy -- through an agency the publicly states that it does NOT set policy.

- Mixed Oxide Fuel -- the product of commercial reprocessing - - is much more dangerous, harder to control in a reactor than uranium fuel and more deadly compared to uranium in case of a major reactor accident. The increased hazard is because there is both more plutonium in the reactor core, and also more of the heavier-than-plutonium elements -- all of which are more toxic and more carcinogenic than what has caused enormous suffering in the areas impacted by Chernobyl, and likely Fukushima. No reactors

have been identified to use the fuel and a decade-long testing program that will be needed to test MOX in reactors owned by the Tennessee Valley Authority.

- Plutonium is relatively easy to steal because it does not give self-protecting gamma radiation. It is the perfect radioactive material for a criminal or disgruntled employee to use to terrorize our people. It would be impossible to account for all of the plutonium separated out at any one plant and the more the number of people there are who have any contact with the technology of reprocessing, the more opportunities there are for some terrible radioactive accident or deliberate act of terrorism to occur. The overall issue of international proliferation of nuclear weapons materials is no less a problem and should be included in the public debate. Reprocessing is a terrible idea and no set of rule-making can make it a better idea. We hope the Blue Ribbon Commission honestly concludes that the best guidelines are those that discourage proceeding with reprocessing.

Respectfully,

Gwen L. DuBois MD, MPH

Steering committee

Chesapeake Physicians for Social Responsibility

Rulemaking Comments

From: Gwen Dubois [gdubois@pol.net]
Sent: Thursday, July 07, 2011 10:57 PM
To: Rulemaking Comments
Subject: Comment on Docket ID NRC-2010-0267
Attachments: reprocessing.doc

See attachment that is meant to replace document sent earlier this evening.