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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

From: Frances Lamberts [frances@ecoisp.com]
Sent: Monday, July 11, 2011 6:12 PM
To: Rulemaking Comments
Subject: Docket ID NRC-2010-0267

Dear NRC,

Regarding "Draft Regulatory Basis for a Potential Rulemaking on Spent Nuclear Fuel Reprocessing Facilities

I travelled to Oak Ridge in early 2007 when the GNEP proposal and spent fuel reprocessing where the subjects of a public meeting there. I presented comments at that meeting **in opposition to spent fuel reprocessing.**

It seems to me very much premature to think about "potential rulemaking" on this matter. Recent events in Japan and as affect our own nuclear power plants in flood-prone regions should lead, in a serious way, to reconsideration of the future of atomic power in our country. Many other - -health, safety, water-consumption, economic and other--problems with this form of meeting our electricity needs should add weight to such reconsideration.

I note that a "Roadmap" energy bill in the U.S. House of Representatives gives the NRC two years **following enactment of the bill** to conclude rulemaking for reprocessing-facilities licensing. Given reasonable expectation of length of time before such bills become law, again, I see no need for NRC to begin "potential" rulemaking at this time. The many safety problems at nuclear facilities, from tritium leaks to "near misses" on near routine basis would seem to merit greater urgency of attention from NRC staff.

Should you decide, nonetheless, to proceed on this matter, please remember an earlier, AEC determination that facility licensing decisions for nuclear-fuel reprocessing **"require an environmental impact statement"** under NEPA. I support and urge that aspect. The full range of consequences of reprocessing -- the resultant far greater radioactive- waste volume to be dealt with, its toxicity and proliferation and security risks, its economic cost (to be shouldered by ratepayers, no doubt) and others -- should be thoroughly documented and weighed. I have no doubt that performance of a comprehensive, Programmatic EIS would lead you to recommend against rulemaking toward licensing of reprocessing facilities, at this time.

Again, I respectfully express my opposition to any facilititation of spent-fuel reprocessing and hope that rulemaking for its licensing will be abandoned.

Sincerely,
Frances Lamberts

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