

RAS #RR-166

Docket Hearing

From: Ethan Scarl [ethan@hevanet.com]
Sent: Wednesday, August 03, 2011 5:10 AM
To: Bollwerk, Paul
Subject: NRC: No Need For Areva

Dear Atomic Safety and Licensing Board,

In addition to the comments below indicating lowered prospects for nuclear construction, no government agency should be encouraging nuclear power unless there is truly no alternative. The environmental impacts of nuclear power go far beyond the immediately polluting byproducts from uranium extraction and enrichment. We have no idea what to do with the waste from existing nuclear facilities. The NRC has been conducting hearings on depositing great-than-Class-C waste at Hanford, though Hanford's existing waste problems remain unsolved. The only serious attempt at dealing safely with nuclear is Finland's enormous burial cavern at Onkalo, intended to keep a mere 80 years' production from a small country safe for the required 100,000 years. There is no prospect that the United States can afford to do what would be required to render its own waste safe for that period of time.

Now, with respect to immediate needs for uranium:

NRC regulations for the implementation of the National Environmental Policy Act (NEPA) require the NRC to prepare a supplemental EIS in the event of "changed circumstances bearing on environmental concerns and bearing on the proposed action or its impacts." See 10 CFR 51.92(a). Three worldwide trends have combined to create just such changed circumstances with respect to the need for the proposed Areva uranium enrichment facility: a significant depression in the uranium market following the nuclear crisis in Japan, greatly increased cost estimates for new reactors, and a markedly reduced pace of new nuclear project construction. In light of these trends, the EIS' assertion that there is a need for the proposed Areva uranium enrichment factory - i.e., that its environmental impacts are justified -- is not supportable. Therefore, as required by 10 C.F.R. 51.92(f)(1), the NRC must revise the EIS and publish it in draft for public comment. If the EIS is not revised and re-published, the application must be rejected

Thank you,

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