

WCO outreachCEM Resource

From: Swanson Jane [janeslo@me.com]
Sent: Monday, March 19, 2012 5:54 PM
To: WCO outreach Resource
Subject: Comments "Background and Preliminary Assumptions for an Environmental Impact Statement—Long-Term Waste Confidence Update."
Attachments: SLOMFP comments Waste Confidence 3.doc; ATT00002.htm

See attached comments from San Luis Obispo Mothers for Peace.

Federal Register Notice: 99FR99992
Comment Number: 188

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SLOMFP comments Waste Confidence 3.doc		37952
ATT00002.htm	2620	

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TO: WCO Outreach@nrc.gov

FROM: San Luis Obispo Mothers for Peace

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Henriette Groot, Ph. D
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RE: Comments on draft report entitled “Background and Preliminary Assumptions for an Environmental Impact Statement—Long-Term Waste Confidence Update.”

The references to headings and page numbers below refer to Accession Number ML11340A141

SECTION 3: Waste Confidence: Background

The side box on page 3 states that “Through the decision, the NRC indicates its confidence that disposal is technically feasible and will be made available for U.S. commercial spent nuclear fuel. The decision also conveys the Commission’s confidence that, until disposal is available, spent fuel and high-level waste can be managed safely under continued NRC regulatory oversight.”

The NRC may have confidence, but the confidence of San Luis Obispo Mothers for Peace (SLOMFP) is undermined at the start by the deceptive terminology. “Spent fuel” is in fact more radioactive than the fuel used in the reactors, and it can not be “disposed” of, but only be put in storage in an attempt to isolate it from the biosphere for the approximate 250,000 years some of the elements will remain lethal.

SECTION 6: Alternatives Under the National Environmental Policy Act

SLOMFP highly recommends the no-action alternative of continuing to review the Waste Confidence decision and rule for updates every 5 to 10 years. New information and a significant probability of unforeseeable events make frequent review mandatory. Within the past year there have been unanticipated floods and earthquakes at U.S. plants. Add to this the ongoing disaster at Fukushima and the lessons still being learned from that combination of geologic events and human and mechanical failures, and it is clear that it would be extremely irresponsible to fail to review waste storage frequently.

Recommendation #5 on page 12 of U.S. Nuclear Power Safety One Year after Fukushima, by David Lochbaum and Edwin Lyman of Union of Concerned Scientists, dated March, 2012 and available at http://www.ucsusa.org/assets/documents/nuclear_power/fukushima-anniversary-report-3-5-12.pdf points out, in part, that

“U.S. plants typically contain several times as much spent fuel as the one at Fukushima Dai-ichi Unit 4, and stored in a densely packed configuration that would be harder to cool in the event of a rapid loss of pool water. Stakeholders recommended that the spent fuel pool hazard be decreased by accelerating the transfer of irradiated fuel to dry storage, thereby reducing the density of the fuel remaining in the pools.”

SECTION 7: General Environmental Impact Statement Methodology and Scope of Impacts

The Staff plans to analyze the impacts of storage from the years 2050 to 2250. By 2250 the oldest fuel will approach 300 years of storage.

Again, confidence is not inspired. Given that some of the elements of radioactive waste will remain lethal for 250,000 years, the time frame of 300 years represents only 0.12% of the time needed to store these wastes. If that is the best that a regulator can do, then clearly no more radioactive waste should be allowed to be generated.

SECTION 8: Environmental Impact Statement Bounding Assumptions and Scenarios for Analysis

Subsection 4, quoted in part below from page 10, is an admission that the Staff cannot project changes in transportation 250 years into the future, even while expressing “confidence” that it can move and

store lethal radioactive wastes for 250,000 years.

“(4) Long-term transportation impacts will be based on current package technologies, transportation infrastructures, and regulatory requirements....In addition, to develop the transportation impacts analyses, the staff will assume that present-day infrastructure and transportation modes (rail, truck, barge) are in place in the future... “

There is no basis for this “confidence”. Section 4 is, instead, an effort to hide the regulator’s head in the sand because it is not possible to project so far into the future.

Likewise sub-section 6 of 8.1 this document contrives to evade reality. From pages 11 and 12:

“At a recent public meeting on its Waste Confidence update plans, the NRC received a request that it include in the EIS a scenario that accounts for a collapse of society and loss of government institutions, with a resulting lack of control over, and knowledge about, nuclear plants and radioactive waste. The staff has considered this suggestion and, as explained below, is proposing not to include this as one of the analyzed scenarios... There are no trends or evidence to suggest that society’s control of spent fuel and highly radioactive waste will decline in the future or cease to be a government-regulated endeavor.”

Given the record of human history, the burden of proof lies with the regulator and not with the citizens of San Luis Obispo County.

Brice Smith, in "Insurmountable Risks" A Report of the Institute for Energy and Environmental Research, pages 238, 239 sums up the reality the NRC is not recognizing in its draft report.

"Developing ways to manage spent fuel and reprocessing waste in such a way that will protect both current and future generations is complicated by the time-scales over which some of the important radionuclides will remain dangerous. For example, the half-life of plutonium-239 is 24,000 years, and thus even after 160,000 years there would still be more that four and a half metric tons of plutonium-239 remaining in the waste....Other radionuclides of concern have even longer half-lives.....

To put some of these timescales in perspective, we note that they are comparable to the entire amount of time that modern humans are believed to have existed on Earth. Another way to appreciate the magnitude of these timescales is to note that the first evidence of domesticated plants and animals dates back only roughly 10,000 to 12,000 years while the oldest known evidence of human writing goes back at most 5,500 years."

Rather than expressing "confidence" in a plan to store for a mere 300 years radioactive wastes that will be lethal for 250,000 years, the NRC should be making plans for the orderly shut down of all nuclear plants in the nation.

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