

# PUBLIC SUBMISSION

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**Docket:** NRC-2012-0246

Consideration on Environmental Impacts on Temporary Storage of Spent Fuel After Cessation of Reactor Operation

**Comment On:** NRC-2012-0246-0001

Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation

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Comment on FR Doc # 2012-26295

10/25/2012

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77 FR 65137

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## General Comment

See attached file(s)

## Attachments

Fleetham-regulatory comment

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Add= S. Lopas (SLL2)

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I am writing as a concerned and interested citizen about the forthcoming Environmental Assessment that deals with the Waste Confidence Decision. Included in your filing is a quote from the DC Circuit Court about the inadequacies of the Decision with regards to your agency's obligations to meet certain standards implemented by the National Environmental Policy Act. The Court found that "the Commission did not evaluate the environmental effects of failing to secure permanent disposal," and listed this as one of the reasons for vacating the Decision and requiring further Environmental Assessment. I am commenting to voice my complete agreement with the DC Circuit Court, and encourage your agency to exhaustively evaluate the environmental effects of not securing a permanent disposal option for nuclear waste.

A Huffington Post article from 2011 notes that the United States has over 70,000 tons of waste, still accumulating and in more than 30 states. This seems to be quite a dangerous proposition, especially in light of recent weather events like Hurricane Sandy. Your agency has continually espoused the safety of on-site nuclear storage, and touted the reliability of backup power in the event of an electrical failure. But to store that much waste in so many sites in so many states seems to be a gamble every day. There is nuclear waste stored all over the country that could be vulnerable in the event of a violent weather system or act of terrorism. If even one storage facility were compromised the immediate and long-lasting effects would be catastrophic for the environment and indeed for human life.

Nuclear waste is comprised of radioactive material that will remain toxic to all living organisms for many lifetimes to come. It is only reasonable for any complete Environmental Assessment of nuclear storage to contain a thorough investigation of any and all environmental impacts resulting from the failure to secure a method of permanent disposal. This should include a detailed examination of the environmental effects of all possible and foreseeable future events. One must look no further than Japan and the Fukushima disaster to know that nuclear facilities can be compromised. An article entitled *Worldwide Health Effects of the Fukushima Daiichi Nuclear Accident* notes that the land around Fukushima "may not be inhabitable for decades to centuries." The same article estimates between 15 and 1100 cancer related mortalities due to the Fukushima accident.

Perhaps if these potential realities were better understood there would be greater motivation for securing a permanent disposal location. It stands to reason that if all of the country's nuclear waste were housed at one secure location it would be easier to protect in the event of an emergency. We are expecting our environment to sustain human life for untold years, in order to do that we must safely store our nuclear waste. Cooling pools and dry cask storage scattered around the country may be safe for the immediate future, but it is not a forever solution. All the risks and uncertainties associated with that must be taken seriously and must be thoroughly investigated in the process of an honest Environmental Assessment. As a citizen of this country and of this world I respectfully ask the NRC to diligently investigate the risks to the

environment in the event of a failure in any of the many on-site nuclear storage facilities around the country. The scope of this assessment should be wide, as the result of just one failure at one location could be a national disaster. Somehow this world has been entrusted to us, and we would be derelict in our duty to it and to our fellow human beings to not fully investigate any possible environmental impact of the current nuclear storage scheme.