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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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USNRC

General Comment

Please see attached uploaded letter of response.

Attachments

Letter to NRC

SUNSI Review Complete
Template = ADM - 013
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Add= S. Lopas (SLL2)



November 13, 2012

Allison M. Macfarlane, Chair
Kristine L. Svinicki
George Apostolakis
William D. Magwood IV
United States Nuclear Regulatory Commission
Washington, DC 20555

RE: Notice of Intent to Prepare Waste Confidence EIS

Dear NRC Commissioners,

This letter is from a private concerned citizen in response to the NRC public hearing on Nuclear Waste Confidence. I am grateful as an American citizen to have the opportunity to voice my opinion, and am confident that you will hear and consider my concerns.

The NRC strives for transparency and public response, yet the processes and procedures in place do not provide for a true public dialogue and discussion. I am writing to respectfully ask that you withdraw the [Notice] "Request for Comments on the Notice of Intent to Prepare an Environmental Impact Statement (EIS) and Notice of Public Meetings" that was published in the Federal Register on 10/25/12. The Notice does not provide the public – ordinary citizens of the United States of America – sufficient and understandable information by which we can develop informed responses. Because of this opacity, most Americans are occluded the ability to intelligently respond, and therefore are left out of the process.

To my understanding, the EIS is in response to the US Court of Appeals decision in State of New York v. NRC, 681 F3d 471. As a concerned New Yorker, it seems that the Notice fails to provide two relevant issues – or informative material – that is REQUIRED by the NRC's 10 CFR § 51.27(a)(2) regulation on the manner in which a "Notice of Intent to Prepare an EIS" is to unfold. Firstly, by way of a "description of the proposed action" and secondly, "to the extent sufficient information is available, possible alternatives."

This failure requires address, and I strongly oppose the EIS moving forward. As a citizen who deeply cares about the future of our country, its environment and its inhabitants, it seems remiss, if not alarming that the NRC is not identifying the "proposed action" in the Notice. How can the public make comments on the range of possible "alternatives" if this is unclear?

We need to know what the NRC and its affiliated agencies intend to do about the hazards of spent nuclear fuel storage, and the complete scope of possible environmental impacts – to land, water, air – and most importantly to our bodies, to the health of the citizens in the United States. Without being fully informed, without true transparency, the "facts" become complete guesswork. The NRC needs to sit down with ordinary citizens and REALLY hear their concerns, and the NRC needs to listen. We all in agreement that a long-term solution to storing radioactive waste must be found. But if the NRC excludes the ideas and voices of the creatives, visionaries, innovators and even the dissenters, then we are not truly having an open forum, are we?

If the range of possible alternatives is NOT fully being explored and discussed then we – the American people - are not adequately being drawn into the process. From what I understand, an abbreviated “scope of alternatives” has been presented for dealing with spent fuel rods, and radioactive waste. As learned from past radiological contaminations, safe operation, remediation and disposal are imperative to the mission of the NRC. The risk to human health is too great to gamble on nebulous notifications, opaque proposals and truncated solutions to the country-wide problem of waste.

The American people know that the industry has a track record of hazardous operations, although most of us don't like to think about that fact. We know that hundreds of incidents have occurred at sites where radioactive materials not recognized as waste got managed like trash. Pallets of waste containers were stacked in unstable configurations. Containers were improperly labeled. Shipping records were never retained. Containments were breached. Personnel were not properly trained resulting in their own exposure to toxic amounts of radiation. There were failures to perform required radiological screenings or to implement corrective actions. The issue is one of trust. We don't have “confidence.”

The impact of radioactive pollution of water can be catastrophic. Surface water and deep aquifer resources have been contaminated at sites throughout the United States. These plumes of contamination travel quickly, and there is no method to clean up aquifers. Water is our precious resource that sustains life. We need to insure that these resources will sustain life for many generations to come. Internal exposures of radioactive materials are even more hazardous than external exposures. These particles lodge in the delicate structures, organs and tissues of our bodies – lungs, stomachs, kidneys, and bladders. And contaminated water is not only consumed by human beings, fish swim in it, it is used for livestock, and to irrigate food crops. Municipal water systems are currently not constructed to filter radionuclides in their purification apparatus.

As a concerned citizen I ask that you carefully consider the wisdom of your actions and decisions, be honest in the language that you use and honorable about the methods for distributing information. We need to fairly be included in process. After sixty or more years of producing radioactive waste we still don't have a plan for safe disposal. That is three generations! We are collectively flying by the seat of our pants (or hems of our skirts) trying to solve a possibly unsolvable problem. We know these materials are dangerous for millions of years. We need to STOP making this waste. We need to stop issuing licenses for aging reactors. We need to develop a sustainable energy plan that is in sync with the systems of the earth: water, weather, seismic activity – and with the life forms that inhabit our planet.

I thank you kindly for your time and thoughtful consideration of this letter.
Sincerely,

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