

WASTE CONFIDENCE SCOPING COMMENT

2012 NOV 21 AM 10: 37

NRC-2012-0246

RECEIVED
November 14, 2012

US Nuclear Regulatory Commission
Washington, DC 20555
NRCExecSec@nrc.gov

Dear Commissioners:

PSR
Physicians for
Social
Responsibility



10/25/2012

77FR 65137

84

I am writing on behalf of the Chesapeake chapter of Physicians for Social Responsibility.

I am very concerned about the conditions of spent fuel at Calvert Cliffs and the potential catastrophe that could occur in our region should a loss of backup power occur. While we appreciate that a considerable amount of fuel has been moved from the pool to dry casks, a step that should be applauded and copied by owners of nuclear power plants across this nation, there still remains a huge amount of radioactive material vulnerable to manmade and natural disasters. Without mandatory backup generators or containment structures like that protecting reactors, loss of cooling as you well know, could lead to overheating which in turn could lead to the explosive release of more radioactive cesium than twice that released by all atmospheric testing here to date and 40x that which was released by the Chernobyl explosion. Radioactive cesium, with a half-life 30 years, would then contaminate a huge amount of our State rendering it uninhabitable for several hundred years, and would destroy the part of our economy based on farming and fishing. Mothers and fathers would live with the fear of their children ingesting cancer causing contaminated soil and the simple act of playing outdoors would lead to nightmares just as it has for parents in Fukushima Province.

This must never be allowed to happen. Now that Climate Change is here, we can imagine hurricanes that totally overwhelm the infrastructure of major cities. Did we ever think that New Orleans or New York City would be so profoundly damaged by storms in our lifetime? The 100 year storms, as Governor Cuomo so aptly stated, come every couple of years. Hot summers because the waters that nuclear power plants depend on for cooling, to be too warm in the summer. Fort Calhoun in Nebraska remains closed over one year after the Missouri flooded around it. Hurricane Sandy put 16 nuclear power plants in its path on alert. The spent fuel pool at Oyster Creek narrowly averted disaster. How many warnings must we ignore? How much longer will we depend on luck rather than good planning to do what needs to be done?

Please regulate the expeditious movement of fuel out of spent fuel pools and into dry casks as soon as sufficient cooling has occurred. Please begin to make long term plans for Hardened on Site Storage on Site at each NPP. Please help make it safe for neighbors of Calvert Cliffs Nuclear power plant and the other nuclear power plants around our Nation

The solution is a campaign to move all of the fuel that has cooled already for 5 years into dry casks as expeditiously as possible in the short run. Funds from money that has been collected by the DOE for

SONSE Review Complete
Template = ADM-013

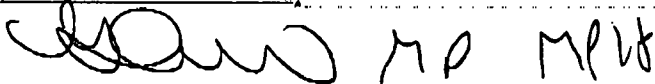
F-REDS = ADM-013
Call = S. Lopez (5112)

management of waste could be made available just as Exelon was awarded 35million dollars recently from that source.

In the long run, Hardened on Site Storage, with casks separated and further entombed is the way to go if we want to make the kind of radioactive spent pool fuel fires feared at Fukushima, truly unlikely in our future.

A more serious problem is that contrary to NRC regulation 10 CFR 51.47 (a)(2), we have not been provided a description of the proposed action and a description of any alternatives to the proposed action of which the NRC is aware so we are unable to comment as to whether your proposed "scope" is adequate or not. As you can see from my comments above, environmental impacts of natural disasters, pool water loss, raised water temperature elevations, pool density and many others have not been offered as the type of scope which you will be looking at.

Please do your due diligence and provide us with your scope range so that we can comment about the public health concerns we have.



Gwen L. DuBois MD, MPH

Chesapeake Physicians for Social Responsibility

Crabshell Alliance

Instructor in Medicine, Johns Hopkins School of Medicine