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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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General Comment

See attached file(s)

Attachments

Marvin Lewis 11282012

SUNSI Review Complete
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Add= S. Lopas (SLL2)

Lopas, Sarah

From: Marv Lewis [marvlewis@juno.com]
Sent: Wednesday, November 28, 2012 9:54 AM
To: Lopas, Sarah; gbthatisme@yahoo.com; frieda302@comcast.net; michaelbft48@comcast.net; ncohen12@comcast.net; phyllis.criswell@gmail.com; dianed@nirs.org; gizmogink@optonline.net; rogerh@energy-net.org; fran@hazam.org; djhonicker@msn.com; kevin@beyondnuclear.org; marvlewis@cavtel.net; info@ieer.org; brett@libertynet.org; kavon95@gmavt.net; nukenet@energyjustice.net; josephoconnor666@comcast.net; marvlewis@juno.com; babsjewell@yahoo.com; Docket, Hearing; Rulemaking Comments
Subject: More comments on Waste Confidence.

Dear Ms Lopas,

Thank you for your continuing help. I have discovered why I have needed so much of your help. Comments go to regulations.gov. I was acclimated to comments going to the NRC. I assumed wrong that my comments would go to the NRC website quickly. Instead my comments are going to the regulations.gov site after a long delay.

This long delay serves the Licensee and the NRC, but not the safety and health of the public. The public needs to know the shortcomings of the licensee process before the license is granted, not after the license is granted with situations like Fukushima, Ginna, TMI#2, etc. Timely and quick public access to public comments should alleviate this delay.

This delay is aggravated with unseemly short comment periods. Waste confidence has turned into a multi-faceted dragon. I suggest and petition that the comment period for this instant waste confidence rulemaking be extended.

Please accept this letter or email as my continuing comments on the Waste Confidence Rulemaking.

These comments concern the issue of generic vs site specific which was commented upon in the recent public meeting on this rulemaking by the staff and licensee. I have difficulty understanding the split because of the actions of the NRC. Whenever there is a site specific incident, the NRC seems to send a letter to all NPPs that they should assess their respective sites for the same issue. I remember that San Onofre discovered pitting and corrosion in many steam generator tubes, and the NRC sent a letter to all licensees of NPPs to evaluate their respective plant for said problem. If the NRC seems to consider a site specific problem generically, why should the onus be put upon commenters to separate generic and site specific?

Another issue with generic vs site specific is that often the NRC will allow a license to be issued without a cure to the deficiency allowing generic issues to languish for decades with temporary fixes. The fire problems at Ginna, San Onofre and others come to mind. Isn't this bias an invitation to the licensee and staff to ignore problems by throwing them into a 'generic' wastebasket?

How broad is 'generic'?

I admit that some issues may be site specific although I do not see any that should be 'site specific'. This leaves the issue of how far reaching and broad 'generic' is.

Admiral Hyman Rickover tried to answer the problem about what the dangers of nuclear power were and touched upon a very broad issue.

"I'll be philosophical. Until about two billion years ago, it was impossible to have any life on earth; that is, there was so much radiation on earth you couldn't have any life: fish or anything. Gradually, about two billion years ago, the amount of radiation on this planet and probably in the entire system reduced and made it possible for some form of life to begin... Now when we go back to using nuclear power, we are creating something which nature tried to destroy to make life possible... Every time you produce radiation, you produce something that has a certain half-life, in some cases for billions of years. I think the human race is going to wreck itself, and it is important that we get control of this horrible force and try to eliminate it... I do not believe that nuclear power is worth it if it creates radiation. Then you might ask me why do I have nuclear powered ships. That is a necessary evil. I would sink them all. Have I given you an answer to your question." Admiral Hyman Rickover

This statement of Admiral Rickover's goes to the issue of the total amount of radiation that the nuclear fuel cycle looses upon the Earth. Every NPP and nuclear WMD looses radiation. Every nuclear facility releases radiation. The entire fuel cycle of WMD and NPPs release radiation. The NRC looked at it in the past, but did not consider the evolutionary clock. The contribution of everyeachone of the fuel cycle facilities needs to be looked at as a contributor to the total radiation loosed by humankind. When or will the level of man released radiation reach the threshold where the evolution clock of the human race will stop?

With respect to Ms Lopas help, I submit the above as my continuing comments on Waste Confidence Rulemaking, Please forward them to the correct bin.

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11/28/12.