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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

Submitter Information

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Organization: International Brotherhood of Electrical Workers

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RULES AND DIRECTIVES
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General Comment

See attached file(s)

(159)
10/25/2012
77 FR 65137

Attachments

Waste Confidence Scoping Comments to NRC 2012-letter.docx

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



**INTERNATIONAL
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January 2, 2012 ³

Ms. Cindy Bladey
Chief, Rules, Announcements, and Directives Branch (RADB)
Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**RE: Comments regarding Waste Confidence Consideration of
Environmental Impacts of Temporary Storage of Spent Fuel
after Cessation of Reactor Operation NRC Docket ID.
NRC-2012-0246**

Dear Ms. Bladey,

On behalf of the approximately 725,000 members of the International Brotherhood of Electrical Workers (IBEW), I write to comment on the proper scoping for a new Environmental Impact Statement (EIS) as part of the Nuclear Regulatory Commission's (NRC) plan to write a new Waste Confidence Decision and Rule.

The IBEW supports the NRC's efforts to outline an appropriate path to address the U.S. Court of Appeals for the D.C. Circuit June 8, 2012 decision that vacated and remanded the NRC's 2010 Waste Confidence Decision and Rule. The 24 month period the NRC allotted to prepare an EIS and promulgate a new rule is appropriate. Although the NRC has stated it will not issue or renew any new licenses during this time, the IBEW is grateful that NRC is still continuing its licensing process up to that point.

As NRC considers the proper scoping of the EIS, the IBEW asks that NRC consider the following:

- The analysis the NRC conducted to support its 2010 Waste Confidence Decision and Rule is appropriate, with the exception of the three specific issues mentioned by the court. While NRC should address the court's issues, the EIS should go no further than what is required by law and the court's decision. The scope of the EIS should be narrow.
- Regarding the long-term underground storage of nuclear waste, there is international scientific consensus that disposal in a geologic repository is an effective and an appropriate long-term solution. Several nations are in the process of building or considering long-term geologic storage.



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Ms. Cindy Bladey
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- The Department of Energy's Yucca Mountain EIS No Action Alternative Analysis, which has already been adopted by the NRC, is sufficient to address the court's concerns regarding the possibility that a permanent long-term repository will never be developed.
- The extremely low probability of either fires or significant leaks in spent fuel pools should be considered in NRC's analysis. This is in keeping with the court's comments regarding these two distinct matters. In addressing these issues, the IBEW respectfully requests that NRC only evaluate potential scenarios that are considered reasonably credible.
- Regarding spent fuel pools and dry cask storage, experience in the United States has shown that spent fuel can be safely maintained in either storage medium for an extended amount of time and well after permanent reactor shut-down.
- Evaluating the transportation of used nuclear fuel should be beyond the scope of this EIS. The environmental impacts of transportation will be appropriately addressed in future EISs should a consolidated storage repository be constructed.

Thank you for the opportunity to comment on the proper scoping of an EIS as NRC begins the process to issue a new Waste Confidence Decision and Rule.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Edwin D. Hill".

Edwin D. Hill
International President

EDH:mlm