

GE Stockholders' Alliance RULES AND DIRECTIVES

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Ms. Cindy Bladey, Chief
Rules, Announcements, and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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Comments on the Environmental Impact Statement regarding the NRC's Nuclear Waste
Confidence Rule Docket ID NRC - 2012 - 0246

To: Ms. Bladey and staff members

After our careful review of the failure of the NRC and the nuclear industry to deal with high-level radioactive waste, we appreciate the decision of the U.S. Court of Appeals for the D.C. Circuit that it is in the best interest of public health and safety for the NRC to reconsider its Nuclear Waste Confidence Rule.

Because no safe technology or location exists to isolate radioactive waste, members of the GE Stockholders' Alliance (GESA) urge the NRC to mandate a halt to the further generation of radioactive waste unless and until the waste already generated has been isolated from the environment. The nuclear industry's corporate leadership and regulators should stop allowing the creation and dispersal of the ultimate poisons that will continue to threaten today's and future generations.

We urge you to include the following comments during your research and deliberations about the potential to isolate nuclear power's perpetually damaging waste.

1) FUEL POOLS:

Overcrowding of irradiated fuel assemblies. Most spent fuel pools at U.S. reactor sites contain five times or more the quantity of irradiated fuel assemblies the fuel pools were designed to hold. The higher density causes higher risks, especially if the cooling water were to drain down and uncover the fuel assemblies. The uncovered rods could self-ignite and cause colossal releases of radioactivity --- endangering human lives, and contaminating food crops, animals, water and air for hundreds of miles and generations to come.

Necessity of requiring off-site emergency power for all spent fuel pools. Cooling water must be constantly provided to the spent fuel pools. Pumps providing fresh cooling water require electricity to operate. Diesel power can provide short term emergency electrical power, but is not a long term solution. Nuclear power owners should be required to ensure an adequate off-site source of electricity for continuous pump operation in case of loss of power, or in case of the failure of submersible pumps for those fuel pools that are in flood plains, or are subject to tsunamis, or are downstream from vulnerable dams.

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Effects of climate change and natural disasters. Hurricane Sandy in 2012 and Fukushima's earthquake and tsunami in 2011 illustrate the dangers and risks of increasingly severe weather conditions that scientists tell us are going to get worse. Some tell us of the threat of solar flares to our electrical grid system --- possibly causing long-term grid power outages. Summer droughts causing low flow in rivers have already caused reactor shut-downs in our southeast states, as well as in France and other European countries. Flooding in the U.S. midwest caused great anxiety in the summer of 2011 at Nebraska's Cooper and Ft. Calhoun reactor sites --- and may have caused permanent damage at both reactors. Last year's tornado season was severe in the mid-south and mid-west U.S. and also caused damage at reactor sites.

Reactor design flaws. Spent fuel pools were not designed with long term storage in mind, nor were they required to provide protection from potential terrorist attacks. Therefore, reinforcements of spent fuel pools, and security enhancements must be required for all reactor spent fuel pools.

Reactor aging problems. Because of spent fuel pool aging, the use of unproven materials and designs in the initial construction, and inadequate maintenance, some fuel pools have leaked and have released radioactive water into the river, lake or ocean, the sources of their cooling water, and into the ground water. Spent fuel pools must be monitored until they are emptied and dismantled.

Human error and human nature. Scientists can and do design elaborate technical devices that are "foolproof" and that can operate with amazing results (such as nuclear reactors). However these devices are operated by humans who are not as foolproof as human inventions. These humans sometimes fall asleep on the job, bring their addictions to work, are subject to accepting bribes, falsify required records, and make operating substitutions that can cause reactor failure. We see no way to ensure that this human element can be eliminated.

Security enhancements. Today's operating reactors were designed in an era when security issues were not as urgent as they are at present. However, it is currently imperative that the security of reactors, spent fuel pools and dry cask storage units must meet the highest safeguards standards.

Utilities' drive for profit. Since investor-owned utilities must seek to achieve profits, costly safety measures may be bypassed or deferred. A case in point is that the NRC has allowed the decommissioned irradiated fuel pool at Millstone Unit One in Connecticut to maintain a full load of irradiated fuel assemblies even though that reactor closed in 1995. The utility should have been required to transfer all the irradiated fuel assemblies into dry cask storage units, since all the fuel had cooled for at least five years by the year 2000. We urge the NRC to require Dominion Nuclear Connecticut to make that transfer now.

2) DRY CASK STORAGE:

The design and fabrication of dry cask storage units currently used at some reactors are inadequate. Industry and NRC whistleblowers have reported a lack of quality assurance in some current dry cask storage units, which has revealed seismic damage, hydrogen explosions, inner

seal leaks, radioactive gas leaks, design and fabrication flaws, and security deficiencies. The NRC should mandate that only the highest quality of dry cask storage units are to be permitted. We strongly advocate that the NRC require fortified, hardened on-site cask storage for all irradiated fuel assemblies that have been stored in the reactor's spent fuel pool for five years or more. That is for the greatest safety at all reactor sites, the irradiated fuel should be transferred into reinforced dry cask storage units as soon as possible. The dry casks should be designed and built to last for centuries, with materials that are resistant to corrosion and leaks, and are fortified to withstand possible terrorist attacks and hurricane, tornado, and earthquake damage. The casks should be camouflaged, dispersed at reactor sites, and buried underground or protected as much as possible with thick bunkers and berms.

3) LACK OF A LICENSED, PERMANENT DISPOSAL SITE FOR IRRADIATED FUEL RODS:

We believe it is imperative to halt the continuing generation of radioactive waste at nuclear reactors. We urge the NRC to deny any licenses of new reactors, to deny requested license extensions for operating reactors, and to rescind recently issued license extensions --- unless and until, if ever, truly reliable and permanent radioactive waste technologies and disposal sites are developed.

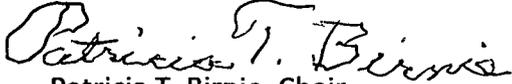
We believe that operating reactors should be required to cease operation at the earliest opportunity. The first reactors on line that should cease operation are the 23 General Electric Mark I BWR reactors and the eight GE Mark II BWRs, all of which have proven, undeniable design flaws.

During the process of closing down the nation's currently operating reactors, and those that have already been closed, we urge the NRC to be vigilant in monitoring the status of the high and low level radioactive waste present at every reactor site nationwide. Spent fuel pools and dry casks at operating and shut-down reactor sites cannot be considered safe unless and until all their radioactive wastes have been permanently isolated from the human environment.

Reactor owners have been contributing toward the costs of building and operating a permanent, deep geologic disposal facility for irradiated fuel rods. Currently, however, a designated location and safe disposal technologies remain hypothetical. In the meantime, we believe the NRC and the nuclear power industry should seek to convince the Congress to make some of those funds available now for the enhanced design and manufacture, deployment, and oversight of highly fortified on-site storage casks nationwide.

We can think of no actions more urgent than designing and implementing the safest possible interim solution to the risks and threats posed by the nation's lethal irradiated fuel rods.

Sincerely,


Patricia T. Birnie, Chair
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