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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

Document: NRC-2012-0246-DRAFT-0498
Comment on FR Doc # 2012-26295

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General Comment

To the NRC's Notice of Intent to Prepare Waste Confidence EIS,

As a citizen committed to life in this world, I am concerned about the health and safety of my friends and family who live near nuclear power plants, the millions of people who eat food that is irrigated by irradiated water, grown in irradiated soil, and the radioactive particles that are concentrated at the top of the food chain; as well as I am deeply concerned about the health and safety of those in Japan; as well as those who are and continue to be affected by 3Mile Island, and Chernobyl; as well as I am deeply concerned about the genetics and well being of every person and living organism that subsists in this world, as our world is already loaded with cycling radioactive particles, and mining, plants and waste that continue to emit radiation and are at constant risk of accidents.

I fully support the suggestions made in the comment submitted by the Nuclear Information Resource Service (NIRS) for what the environmental impact statement (EIS) should include. This comment is submitted with a petition of almost 3,000 individuals and organizations that also support it. I have copied the letter again for you to see below. I urge you to thoroughly include in the scope of the EIS each point that is detailed here, and to take on the further actions that each point details.

I would like to highlight the forth point being that a of the EIS must include the requirement that there be no further production of this waste; based on no further licenses, no license extension and expiration of existing licenses. Inclusion of this alternative must include a consideration of the

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environmental and health consequences of the production of nuclear fuel since commercial production of nuclear fuel would be phased out under this alternative, but not others. NEPA requires that impacts that are tied together by causation be assessed together.

Attachments

Nuclear Waste EIS Scoping Hearing Public Comment

Please again receive these comments in full to the NRC's Notice of Intent to Prepare Waste Confidence EIS.

We appreciate the June 8, 2012 ruling by the District of Columbia Circuit of the U.S. Court of Appeals ending the Nuclear Regulatory Commission generic denial of the need to consider problems associated with the storage and management of highly radioactive irradiated nuclear fuel at reactor sites (finally!) and make these comments on what the "scope" of this environmental impact statement (EIS) should include:

- 1) NRC must assess the overfilling of highly radioactive irradiated nuclear fuel pools as a factor in catastrophic events, including drain-downs and fires, but also inadvertent criticality and other events where loss of pool integrity results in inability to stabilize cooling within the structure.
- 2) NRC must compare and contrast the worst-case-scenarios for radioactive releases and health consequences from a disruption of current dry storage, fuel pools and "hardened" dry storage. Based upon this, NRC must examine alternative changes in its regulatory requirements for waste storage on-site since it is easy to forecast, based on existing data, that hardened storage provides a greater margin of health and safety to the public compared to over-filled pools.
- 3) NRC should exclude off-site "interim" consolidation of waste storage because the transport evaluations done to date are not an adequate basis upon which to claim an increase in health, safety or security. The period of transport (likely decades) must itself be included in the overall evaluation of increased health, safety or security, where clearly it will not support such a claim.
- 4) One of the options that the EIS must include is no further production of this waste; based on no further licenses, no license extension and expiration of existing licenses. Inclusion of this alternative must include a consideration of the environmental and health consequences of the production of nuclear fuel since commercial production of nuclear fuel would be phased out under this alternative, but not others. NEPA requires that impacts that are tied together by causation be assessed together.

NRC's current activity under the joint jurisdiction of the Court of Appeals and the National Environmental Policy Act has legal flaws. A letter from plaintiffs in the court case and others sent to the Commissioners on November 8, 2012 details these flaws. The primary point is that NRC fails to define the proposed action to be evaluated by the EIS, and therefore it is not possible to define scope. We additionally support the call for NRC to start over and do this properly.

Sincerely,

Johanna Anderson