

PMFermiCOLPEm Resource

From: Diane D'Arrigo [dianed@nirs.org]
Sent: Tuesday, March 19, 2013 12:28 AM
To: Olson, Bruce; Fermi3COLEIS Resource
Subject: NIRS Comments on Fermi # FEIS NUREG 2105
Attachments: nirs fermi 3 feis statement on llrw.pdf

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Email to: Bruce.Olson@nrc.gov and Fermi3.COLEIS@nrc.gov
Comments Re: FEIS NUREG 2105

U.S. Nuclear Regulatory Commission
Environmental Projects Branch 2
Division of New Reactor Licensing
Office of New Reactors
Washington, DC 20555-0001

The attached comments are in addition to other comments on the FERMI 3 FEIS submitted separately.

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Email to: Bruce.Olson@nrc.gov and Fermi3.COLEIS@nrc.gov

March 18, 2013

Comments Re: FEIS NUREG 2105

“Low Level” Radioactive Waste

Fermi 3 would generate radioactive waste for which there is no known disposal.

The FEIS relies on the 1996 Generic EIS for License Extensions (not new reactors) and on Guidance (not regulations) developed by EPRI, the industry itself, to claim the waste will be managed and disposed as needed.

The FEIS also relies on the Table S-3 from 1974 to close off, prevent, and essentially prohibit meaningful discussion about the details of the final disposition of so called “low-level” radioactive waste.

No plan has been provided for where and how all of the Class B, C and >C waste will be isolated from the environment for its entire hazardous life.

DTE cannot rely on the Texas disposal site or the Tennessee processors to take all of the Class B, C and Greater than C waste generated by Fermi 3 operation and decommissioning.

The fact that there is one disposal site taking some out-of-compact-waste now in 2013 (WCS in TX via the TX VT Compact Commission on a case by case basis) does not guarantee there will be capacity for Fermi 3 waste once the reactor is up and running and when it closes and is ready for dismantlement and decommissioning. The capacity currently licensed at WCS is not enough for the compact waste from TX and VT let alone currently operating reactors. Assuming new reactors will gain access is unreasonable and unrealistic.

In addition, Tennessee processors of waste may or may not be up and running during the Fermi 3 operating years. The processors come and go, exemplified by the recent closure of IMPACT in Tennessee. After only a few years of operation, it closed leaving nuclear waste for the state to manage and cleanup. Even if TN or other processors could take some of the B, C and >C

waste from Fermi 3, there would be processing waste to be disposed of which would require access in the same way that direct disposal from Fermi would. Volumes might get reduced but the amount of radioactivity would remain.

At least one TN processor requires the generators of the waste to take the waste back if it cannot dispose of it after a year of storage. Waste sent to processors could end up being returned to Fermi property if disposal capacity is unavailable.

Finally, assumptions that a NEW “low level” waste site will open is pure speculation. There is not even any discussion of site searching at this time and it took 32 years to get the WCS dump open. Expecting a new site is unrealistic dreaming. It is more likely that waste will remain at the Fermi site and as such, the EIS and all licensing documents should analyze and plan for indefinite storage at the site.

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