

Gallagher, Carol

Subject: FW: NUREG-1855, Revision 1 COMMENTS

4/15/2013

2013 JUL 24 PM 2: 35

78 FR 22349

From: Marv Lewis [mailto:marvlewis@juno.com]

Sent: Saturday, July 20, 2013 9:33 AM

To: Gilbertson, Anders

Subject: Re: NUREG-1855, Revision 1 COMMENTS

RECEIVED



Mr. Gilbertson,

Thank you for allowing me to 7-19. Since 7-19 is the end of workweek business, I hope that you will allow me today , 7-20 Saturday.

Here are my comments on NUREG 1855 Rev 1.

I scanned NUREG 1855 as best that I could in the limited time that you gave commenters. I request an extension as this PRA issue is a cornerstone of nuclear safety. Also PRA is ultimately an "educated guess." We have seen what educated guesses give us at Fukushima, TMI#2, chalk River and many other sites. PRAs do not concern purposeful deviations from the real data to manufactured data as has been admitted to in Fukushima. There does seem to be an attempt to gage human error, but again purposeful data manipulations are not addressed adequately.

A major issue that I have with many NRC decisions and especially with PRAs is the length of time and the extent of what they address.

Considering length of time PRAs consider only what the NRC, EPA and DOE allows. Emissions from the Nuclear Fuel Cycle are considered 'background' or naturally occurring background the next year after emission. This truncated consideration of radioactivity and dosage has seen the 'background' increase from a reported 60 millirems per year (early 40s) to 360 milli rems per year , in NRC reports, to 600 millirems per year in literature from EPA on PAGs. This brings us close to the radiation background before the Cambrian when life on Earth was not a sure bet. Using these short times for calculating background may leave us with a radiation dose that endangers all life on Earth.

Also Using these truncated periods for emissions contradicts 40CFR1508.7 Cumulative impact and 10CFR51.14(b) CEQ definitions and Proposed and Final Rule 10CFR51.53(c)(3)(ii)(P) Cumulative impacts. Another issue that contradicts the above Cumulative impacts is that the effects of the entire nuclear fuel cycle are never addressed. As far as I can determine, the radioactivity from nuclear weapons , mining, milling and extraction, electricity production are never tallied adequately. I stopped tallying it all up when I saw that the background dose was exceeding the dose referred to by Admiral Hyman Rickover when life could not survive on this Earth. Here is the quote:

"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

Marvin Lewis
marvlewis@juno.com
7-20-1938.

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
Add= -m. Drouin (mxd)