Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Monday, October 07, 2013 8:49 AM
To: Rulemaking1CEm Resource
Subject: FW: My Comments to NRC Re. Docket ID No. NRC-2012-0246

DOCKETED BY USNRC—OFFICE OF THE SECRETARY
SECY-067

PR#: PR-51
FRN#: 78FR56775
NRC DOCKET#: NRC-2012-0246
SECY DOCKET DATE: 10/3/13
TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel
COMMENT#: 00029

-----Original Message-----
From: JimWagner@Safe-mail.net [mailto:JimWagner@Safe-mail.net]
Sent: Thursday, October 03, 2013 5:47 PM
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Subject: My Comments to NRC Re. Docket ID No. NRC-2012-0246

My comments are hereby submitted via e-mail to Rulemaking.Comments@nrc.gov, citing Docket ID No. NRC-2012-0246;

This is about the NRC's "Nuke Waste Con Game" draft GEIS.

Dear Persons,

The National Environmental Policy Act (NEPA) requires consideration of all reasonably foreseeable environmental impacts of a proposed action ---- from cradle to grave.

The question that must be answered in an atomic reactor licensing decision is:

If you look all the way, to the end of the reactor's life, including decommissioning, spent nuclear fuel/irradiated nuclear fuel/high-level radioactive waste storage, and disposal, is having that source of electricity generation -- nuclear power -- worth all the environmental and economic costs, risks, and impacts that will then inevitably ensue?

As soon as NRC licenses a reactor, the generation/creation of irradiated nuclear fuel and all its related costs, risks, and impacts will then follow. The NRC effectively assumes licensing, and goes on from there to look at the impacts of irradiated nuclear fuel storage, although it does a very poor, woefully inadequate job of that!

But the whole point of the Environmental Impact Statement is to allow an informed decision regarding whether to license the reactor in the first place, that is, to allow the generation of irradiated nuclear fuel. NRC does not even attempt to answer that question.

What is the cost of storing irradiated nuclear fuel for any period of time, let alone forevermore? ---- NRC does not even ask that question, let alone answer it, in this draft GEIS.

Is having a new or extended reactor operating license worth all the costs, risks, and impacts of storing irradiated nuclear fuel? ---- The answer to that question is a resounding "NO"!

Have mitigation measures for these costs, risks, and impacts been explored in this GEIS? ---- Again, they have not.

NRC's draft GEIS is completely devoid of such issues. Thus, the draft GEIS makes a mockery of NEPA, as well as the federal appeals court ruling in New York versus NRC.

We have a mountain of commercial high-level radioactive waste 56 years high, and we don't even know what to do with the first cupful. It's time to stop making it!

For that which already exists ---- some 70,000 metric tons worth in the U.S. ---- hundreds of environmental groups representing all 50 states have called on NRC for over a decade to require hardened on-site storage (HOSS).

HOSS would empty the densely packed storage pools, vulnerable to leaks and catastrophic fires, into quality dry cask storage, that is designed and built to last not decades, but centuries, without leaking its deadly contents into the environment.

HOSS would also be designed and built with fortifications against attacks, and safeguards against accidents, including such basic measures as monitors to track heat, pressure, and radioactivity, none of which are currently required.

Although HOSS is but an interim measure, it should be mandated as a national security priority of the highest order.

I join with NRC Chairwoman Allison Macfarlane, who, along with a team of authors, published a study in 2003 warning about the potentially catastrophic risks of storage pool fires, and calling for the wastes to be transferred to dry cask storage on an expedited basis.

A growing list of radioactive leaks from HLRW storage pools have already occurred in the U.S. This has taken place at the following NRC-licensed facilities: Dresden, IL; Hatch, GA; BWX Technologies, VA; Indian Point 1 & 2, NY; Salem 1, NJ; Connecticut Yankee; and Davis-Besse, OH. A pool leak has also occurred at a U.S. Department of Energy licensed facility, the High Flux Beam Reactor at Brookhaven National Lab on Long Island, NY.

Regarding the risk of pool fires, we need only look at Fukushima Daiichi Unit 4 in Japan. That reactor building was badly damaged by the hydrogen explosion that took place there. The HLRW storage pool is now open-air. Another bad quake could topple the entire building, including the storage pool. If the cooling water is lost, some hundreds of tons of HLRW could then catch on fire in a short period of time. The catastrophic release of hazardous radioactivity directly into the environment would dwarf what has occurred up to this point since March 11, 2011.

I am thankful for this opportunity to make public comments.

Jim Wagner and Family,
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Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 38

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D00108972A4ED1)

Subject: FW: My Comments to NRC Re. Docket ID No. NRC-2012-0246
Sent Date: 10/7/2013 8:48:56 AM
Received Date: 10/7/2013 8:48:57 AM
From: RulemakingComments Resource

Created By: RulemakingComments.Resource@nrc.gov

Recipients:
"Rulemaking1CEm Resource" <Rulemaking1CEm.Resource@nrc.gov>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	5156	10/7/2013 8:48:57 AM

Options
Priority: Standard
Return Notification: No
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Expiration Date:
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