WCRM-GEIS2CEm Resource

From: Ellen Lebowitz [ellenl@ellenlebowitz.com]
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Subject: Docket ID No. NRC-2012-0246

To the Secretary; U.S. Nuclear Regulatory Commission; Washington, D.C. 20555-0001; ATTN: Rulemakings and Adjudications Staff Docket ID No. NRC-2012-0246:

The only solution to the high-level radioactive waste (HLRW) problem is to not generate irradiated nuclear fuel in the first place. It has been shown that both fossil fuels and nuclear power can be completely phased out of the U.S. economy by 2040, and replaced by efficiency and renewables, without any further technological breakthroughs required, and for the same percentage of our Gross Domestic Product (GDP) as we currently spend on dirty, dangerous, and expensive fossil fuels and nuclear power.

For the HLRWs that already exist, we must require Hardened On-Site Storage (HOSS). This should be expedited as a national security top priority. Locations where HOSS is not safe (e.g., locations vulnerable to flooding), hardened dry cask storage should be done as close to the wastes' point of generation as possible, as safely as possible. HOSS must be monitored, retrievable, and recognized as an interim measure. HOSS cannot be a permanent measure on the sea coasts and fresh water sources of our country, due to rising sea levels and risk of leakage into our vital drinking water supplies.

As Plutonium-239, for one, will remain hazardous for at least 240,000 years, NRC's assumption that "indefinite storage" at reactor sites can go on literally forever, without a loss of institutional control, is absurd. Let's get real.

It is inappropriate for NRC, in this GEIS, to use the Private Fuel Storage (PFS), LLC "centralized interim storage" proposal, targeted at the Skull Valley Goshutes Band of Indians in Utah, as a model for away-from-reactor storage. Fortunately this proposal was canceled in December 2012. Nearly 500 organizations across the U.S. joined with Skull Valley Goshute traditionals urging NRC to disapprove PFS's license, due to its inherent violation of Environmental Justice principles.

NRC downplays the risks of pool fires by assuming that surrounding populations will be successfully evacuated. Yet, NRC allows utilities, via exemptions from regulations, to do away with 10-mile radius emergency planning zones (EPZs) within 12 to 18 months post-reactor shutdown. This, despite the very real on-going risk of continuous storing of HLRW in pools at such shutdown reactor sites. There is no possibility of an organized, effective evacuation if EPZs have been dismantled.

Additionally, NRC downplays the risks of pool fires by assuming that a pool drain down incident (accident/attack) involves the complete drain down of the pool. However, as Dr. Gordon Thompson of the Institute for Resource and Security Studies (IRSS) has pointed out, any technically competent person paying attention to the issue should have known since 1979 that a *partial* drain down of the pool is actually a worse-case scenario, as the leftover water in the bottom of the pool would block convection current air flow which would help cool the irradiated nuclear fuel, and this blockage would lead to faster heat up to the ignition point.

Thank you for taking and considering these public comments.
Sincerely,

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