Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Wednesday, October 23, 2013 8:06 AM
To: Rulemaking1CEm Resource
Subject: FW: Docket ID No. NRC-2012-0246 High Level Radioactive Waste

DOCKETED BY USNRC—OFFICE OF THE SECRETARY
SECY-067

PR#: PR-51
FRN#: 78FR56775
NRC DOCKET#: NRC-2012-0246
SECY DOCKET DATE: 9/23/13
TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel
COMMENT#: 00055

From: Maria Minno [mailto:maria.minno@gmail.com]
Sent: Monday, September 23, 2013 11:01 AM
To: RulemakingComments Resource
Subject: Docket ID No. NRC-2012-0246 High Level Radioactive Waste

Dear Sir or Madam:

Please accept my comments on NRC-2012-0246, as follows.

First of all, there is no need to continue to produce high-level nuclear waste. It is insane to continue to produce and generate irradiated nuclear fuel. The sane alternative to nuclear power and the forever deadly radioactive waste it inevitably generates is efficiency and renewables, such as wind and solar power. Dr. Arjun Makhijani, President of the Institute for Energy and Environmental Research, has shown in *Carbon-Free, Nuclear-Free: A Roadmap to U.S. Energy Policy,* 2007, that both fossil fuels and nuclear power can be completely phased out of the U.S. economy by 2040, and replaced by efficiency and renewable energy sources, 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. The only thing keeping us in this rut is ignorance and the lobbying power of the nuclear and petroleum-based energy industries.

Hardened on-site storage is the best known solution for the huge accumulation of high level nuclear waste that now exists. Hundreds of environmental and public interest groups, representing all 50 states, have endorsed the Statement of Principles for Safeguarding Nuclear Waste at Reactors, which describes hardened onsite storage. Where possible, densely-packed, vulnerable high level radioactive waste storage pools, at risk of catastrophic fires and radioactivity releases, should be emptied into on-site dry cask storage that is "hardened," meaning that it is

well designed and well built, and safeguarded against accidents, as well as fortified against attacks, and protected against leakage into the environment.

Hardened onsite storage should be expedited as a national security top priority. In locations where hardened onsite storage is not safe (places vulnerable to flooding or earthquakes, for example), hardened dry cask storage should be done as close to the wastes' point of generation as possible, as safely as possible.

The NRC's assumption that "indefinite storage" at reactor sites can go on literally forever, without a loss of institutional control, is absurd. As the environmental coalition's expert witness, Dr. Makhijani of IEER, has pointed out, one of the oldest continuous human institutions in the world, the Catholic Church, is only 2,000 years old. Plutonium-239, for one, will remain hazardous for at least 240,000 years. Hardened onsite storage must be monitored and retrievable, and is only an interim measure. Something must be done to insure that human beings many hundreds (thousands) of years hence are protected from the release of this radioactive waste that is a danger to the entire Earth and that one generation of humans has caused to be released.

Hardened onsite storage cannot be a permanent measure on the sea coasts and fresh water sources (rivers, lakes, reservoirs) of our country, due to rising sea levels and risk of leakage into our vital drinking water supplies. The assumption that dry cask storage and the dry casks themselves will be replaced once every 100 years forever into the future is also absurd. The NRC has not dealt with the very real risk that the irradiated nuclear fuel will so degrade with age that such transfer operations cannot be carried out safely or smoothly. This is especially a risk with "high burn-up fuel," that has spent more time in an operating reactor core, and is thus significantly more radioactive and thermally hot. The NRC has also not provided the price tag for such future transfer and replacement operations.

It is unethical, unjust and unwise for the NRC 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. The PFS was canceled in December 2012 for good reason. It is absurd for NRC to claim that it observes environmental justice principles in its GEIS, while peddling the concept of a blatant violation of nearly 500 organizations across the U.S. that joined with Skull Valley Goshute traditionals urging NRC to disapprove PFS's license, due to its inherent violation of environmental justice.

It is absurd for the NRC to assume that surrounding populations will be successfully evacuated when a spent pool fire occurs, while allowing nuclear utilities to store high level radioactive waste in pools for many decades after reactors permanently shut down. This is a shoddy attempt to defer the costs of dry cask storage as far off into the future as possible, and it puts generations of people at risk. Furthermore, utilities will be allowed to eliminate 10-mile radius emergency planning zones a mere 12 to 18 months after the nuclear reactor is shut down, through exemptions from regulations! Without emergency planning, how can a population unfortunate enough to live near a former reactor be evacuated?

The NRC is being dishonest in its assumption that a pool drain down accident (or attack) involves the complete drain down of a spent fuel storage pool. Environmental coalition expert witness Dr. Gordon Thompson of the Institute for Resource and Security Studies (IRSS) has pointed out that they should know perfectly well that a *partial* drain down of the pool is actually a worse-case scenario, since the leftover water in the bottom of the pool blocks convection current air flow which would help cool the irradiated nuclear fuel, leading to faster ignition.

I live in Florida and we have several nuclear reactors in this state, located at Crystal River and at Turkey Point in St. Lucie. We have fortunately been able to cancel Offshore Power Systems at the Port of Jacksonville and the Levy County nuclear power plant. However, Florida was the site of the Tooth Fairy Project showing that children living near nuclear powerplants have a radioactive body burden that increases their rate of cancer, and Florida has suffered negligence in management of radioactive waste. The nuclear reactors in Florida are located at the coastline and subject to a high potential for flooding from hurricanes as well as sea level rise, and tidal waves. Even earthquakes will become increasingly likely as a result of extensive and careless offshore drilling in the Gulf, and fracking being permitted in Florida.

I do not want my beautiful state, which remains a good place to live in spite of the efforts of industries to destroy its natural beauty and small farms, to be destroyed by irresponsible negligence with high level nuclear waste on the part of the NRC now or in the future. This plan is irresponsible and absurd, and must be improved.

Maria Minno

Environmental Biologist and Consultant
600 NW 35th Terrace
Gainesville FL 32607-2441

Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 64

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D0012099507AE9)

Subject: FW: Docket ID No. NRC-2012-0246 High Level Radioactive Waste
Sent Date: 10/23/2013 8:06:11 AM
Received Date: 10/23/2013 8:06:13 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	7459	10/23/2013 8:06:13 AM

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received: