

## WCRM-GEIS2CEm Resource

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**From:** Teresa A. McFarland [terefar@berkeley.edu]  
**Sent:** Saturday, October 19, 2013 12:42 PM  
**To:** RulemakingComments Resource  
**Subject:** Comments re: Docket ID No. NRC-2012-0246

Dear sirs:

1. The only solution to the high-level radioactive waste (HLRW) problem is to not generate irradiated nuclear fuel in the first place. Our society's "preferred alternative" to nuclear power and the forever deadly radioactive waste it inevitably generates is efficiency and renewables, such as wind and solar power. As Dr. Arjun Makhijani, President of the Institute for Energy and Environmental Research, showed in his 2007 book *Carbon-Free, Nuclear-Free: A Roadmap to U.S. Energy Policy*, 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.
2. For the HLRWs that already exist, require Hardened On-Site Storage (HOSS). 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 HOSS. Where possible, densely-packed, vulnerable HLRW storage pools, at risk of catastrophic fires and radioactivity releases, should be emptied into on-site dry cask storage that is "hardened": designed and built well, safeguarded against accidents, fortified against attacks, and protected against leakage into the environment. This should be expedited as a national security top priority. Locations where HOSS is not safe (places vulnerable to flooding, for example), 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 and retrievable, and is but an interim measure. HOSS 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.
3. 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.

Thank you for considering my comments.

Sincerely,

Dr. Teresa McFarland

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