

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Tuesday, October 29, 2013 2:48 PM
To: Rulemaking1CEm Resource
Subject: FW: docket ID# 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: 10/29/13

TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel

COMMENT#: 00083

From: Cicada Brokaw [mailto:tub65966@temple.edu]
Sent: Tuesday, October 29, 2013 2:06 PM
To: RulemakingComments Resource
Subject: docket ID# NRC-2012-0246

To Whom it May Concern,
referencing docket ID# NRC-2012-0246

I am unable to attend the November 4th hearing in Charlotte, NC and so am sending comments by email. My Comments are in ***Bold Italic***.

My name is Dr. Harold Dennis, address: 362 London Rd., Asheville, NC, 28803.
email: clafey@main.nc.us.

"Indefinite storage (i.e., no repository is available) assumes that the activities associated with long-term storage continue indefinitely, with ISFSI and DTSs facilities being replaced at least once every 100 years."

The assumption of facilities being replaced every 100 years has no historically justifiable basis. Historically, no culture or government has existed indefinitely. We cannot assume that our culture and society will continue indefinitely and that resources to maintain these facilities in a properly maintained state will continue indefinitely. Indefinite storage must include a scenario that ISFSI and DTS facilities cease to be replaced and maintained.

The probability of geologic and/or climatologic damage to a storage facility will approach certainty over time. Therefore, the indefinite storage analyses should include such scenarios as likely possibilities.

One of the possible results of climate change is a run-away greenhouse effect on our climate and the extinction of human beings (and a significant number of other

species). The effect of abandonment of the facilities to such species as might remain needs to be addressed in the indefinite storage analyses.

"ES.13.1.2 Socioeconomics

...

LongTerm Storage:

...

Tax payments would continue and would remain relatively constant at post22 operations levels.

...

Indefinite Storage:

...

Property tax revenue would continue as long as spent fuel remains onsite."

Assertions of continued tax revenue assumes the continued existence of a corporate entity owning this property and being subject to its liability. In the long term, there is no historical justification for such an assumption. The most likely scenario in the long term is that the government will end up purchasing or taking control of such properties in order to assure continued safety for the public. Long term and Indefinite storage analyses cannot assure continuation of Tax payments continuing from such properties.

28 ES.13.1.3 Environmental Justice **and** ES.13.2.12 Historic and Cultural Resources

When "impacts could be SMALL, MODERATE, or LARGE", in other words, there in no GENERIC way in which these impacts can be addressed by these rules. These impacts must be addressed in each Site Specific EIS. This should be made clear in this document, so that EIS development for each site cannot simply include the Generic EIS and fail to do a Site Specific Analysis for these impacts.

Conclusions of "SMALL" impact with regard to long term storage under sections: ES.13.1.4 Air Quality, ES.13.1.5 Climate Change, ES.13.1.6 Geology and Soils, ES.13.1.7 Surface-Water Quality and Use, ES.13.1.8 Groundwater Quality and Use, ES.13.1.9 Terrestrial Resources, ES.13.1.10 Aquatic Ecology are not justifiable and are based upon the faulty assumption that the facilities will be properly maintained and replaced at 100 year intervals. As mentioned previously, this assumption is not historically justifiable. The probability that facilities will eventually not be maintained and will be subject to degradation and disruption must be included in the indefinite analyses in order for the conclusions to be scientifically valid.

"ES.13.1.18 Environmental Impacts of Postulated Accidents

...

Based on the assessment

in Section 4.18, the environmental impacts of these postulated accidents involving continued

storage of spent fuel in pools are SMALL because all important safety structures, systems, and components involved with the spent fuel storage are designed to withstand these design basis accidents without compromising the safety functions."

This analysis seems to lack awareness of significant accidents which have occurred such as Chernobyl and Fukushima. The extreme environmental damage caused by accidents such as these cannot be offset by stating that they are unlikely. To state that they are not possible, as the above statement seems to be asserting is not scientifically justifiable. There is always a possibility of safety system failure which will result in a catastrophic accident that cannot be contained to the site. The low probability of such an accident cannot allow the possibility to be ignored by asserting its low probability. The fact that you are asserting SMALL impact raises a question about the method by which you are weighting the consequences of such accidents in comparison to the probability of the accident occurring.

The above criticisms are likewise applicable to the section "ES.13.2 Environmental Impacts of Away-From-Reactor Spent Fuel Storage"

Page 7-7, lines 21-23 and page 7-10 lines 8-11.

"The value of reviewing continued storage in site-specific NEPA analyses is difficult to quantify; however, a site-specific analysis of the environmental impacts of continued storage would likely not reveal any new information that cannot be addressed in a generic analysis."

The determinations that impacts could be SMALL, MEDIUM, or LARGE for certain impacts in certain scenarios (for example: ES.13.1.3 Environmental Justice and ES.13.2.12 Historic and Cultural Resources) shows that there is information that cannot be addressed in a generic analysis. Therefore, the above statement is false.

Page 8-8 lines 19-22

For both at-reactor and away-from-reactor ISFSIs, there would be no irreversible and irretrievable commitments of resources during continued storage for most resources. However, impacts on land use, aesthetics, historic and cultural resources, waste management, and transportation would result in irreversible and irretrievable commitments.

You say there is no irreversible and irretrievable commitments of resources for most resources. But the resources that are affected are significant. Also you fail to mention that the resources utilized to maintain the waste facilities will then not be available for alternative non-polluting, renewable, energy development. Maintenance of these waste facilities represents an irreversible and irretrievable

commitment of resources that could otherwise be available for development of renewable energy sources. THIS IS SO IMPORTANT AS A VERY SIGNIFICANT IMPACT OF NUCLEAR ENERGY DEVELOPMENT AND MUST BE STATED SOMEWHERE IN THIS DOCUMENT.

*Thanks for your time,
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Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 92

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D00124D66C4A61)

Subject: FW: docket ID# NRC-2012-0246
Sent Date: 10/29/2013 2:47:35 PM
Received Date: 10/29/2013 2:47:36 PM
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	7321	10/29/2013 2:47:36 PM

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