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Sent: Friday, November 15, 2013 10:38 AM

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Subject: PR-51 Waste Confidence

Attachments: Public Meeting (11-04-13) Comment of Robert F Howarth.pdf

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MEMO TO: United States Nuclear Regulatory Commission

FROM: Robert F. Howarth, robfhow@gmail.com

SUBJECT: Comments, Waste Confidence Generic EIS, Docket ID # NRC-210-0246

1. I am Robert F. Howarth from Asheville, NC now retired from a career as an electro-optical engineer. I have the degree of Master of Science in Engineering and am a member of the Western North Carolina Physicians for Social Responsibility, a member of the Union of Concerned Scientists, and a tax paying citizen of the United States of America. I previously testified to the Blue Ribbon Commission on Jan. 18, 2012 and on Jan. 7, 2011 regarding the proposed reprocessing program for the Savannah River Site, GA and for the Draft EIS for William States Lee III respectively..

2. Safe Containment For Eternity (SCFE) must be the objective, the mission of your containment work. With half lives for radioactive nuclear wastes ranging from 30 years for strontium and cesium to some 24,000 years for plutonium239, and time till permissible human exposure ten times half life, it follows as a necessary corollary that that "the making of toxic nuclear waste must be reduced to zero". In our physical world we sometimes cannot achieve the ideal, but often we can and do approach it very closely.

There are some good uses for nuclear energy, e.g. in medicine and in astronautics. But, we know that bombs and weapons are not included in the short list - neither are nuclear power plants. There are better means than these to provide the needs for life on our shared Earth.

- 3. In achieving SCFE and satisfying our necessary corollary of making zero toxic nuclear waste we also can greatly reduce, and in effect, cap the magnitude of safe storage space needed. This will save money, helping alleviate our national debt burden as well as requiring less off-limits, posted land. I encourage you to make Hardened On Site Storage (HOSS) a significant component of your recommendations. Not only does HOSS eliminate the costs of transit and the dangers to public health from inevitable accidents, spills, leaks, fires on our highways, but it keeps the toxic waste where it already is on already posted, off-limits, secured sites. These sites will be with us as such for a long time, even after nuclear power generation is phased out.
- 4. I urge you at NRC to bear in mind, to emphasize the merit of satisfying our necessary corollary and HOSS in forming your proposals for nuclear waste containment and storage. Our long term health and sustainability depend on it!

Thank you for your attention.