

Rulemaking1CEm Resource

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Sent: Friday, November 15, 2013 10:42 AM
To: Rulemaking1CEm Resource
Subject: FW: Draft Waste Confidence Generic Environmental Impact Statement

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From: Jeremy Einhorn [mailto:paintballerr19192@gmail.com]
Sent: Tuesday, November 12, 2013 4:43 PM
To: RulemakingComments Resource
Subject: Draft Waste Confidence Generic Environmental Impact Statement

To Whom It May Concern,

I am writing to say that I will be commenting on the topic about the update of the Waste Confidence Generic Environment Statement (Docket ID NRC-2012-0246-0362). I am fully in favor of writing this new EIS in order to make nuclear waste less of a problem. Throughout my comment, you will see I have provided different reasons on why I feel the updated EIS is needed very much. Potential benefits for the community and agencies, and some ethical environmental reasons effectively show my stance on this topic. Thank you for your time, and I hope this provides some useful insight!

Sincerely,

Jeremy Einhorn

Waste Confidence Generic Environmental Impact Statement

It is without say that spent nuclear fuel is a very serious topic as it is incredibly dangerous and its damaging effects have the potential to be devastating. In 2010, the Nuclear Regulatory Commission (NRC) created a generic environmental impact statement (EIS), called the Waste Confidence Generic Environmental Impact Statement, which dealt with the environmental impact of spent nuclear fuel, or nuclear waste. It is now up for comment on the update and revision of this EIS. I am for the renewal of this EIS, as this is something that can come back to haunt American if not dealt with properly.

When the National Environmental Policy Act [NEPA] was created in 1969, one of the major proponents it included was the EIS. The EIS has many different important uses in current times, and helps alleviate tons of possible problems that may arise. As well as majorly benefitting the agencies and companies creating and planning the EIS, it is also a big factor in the aspect of the community. In a different article written in Science magazine, the authors state that, "...NEPA had been properly characterized by the court as 'environmental full-disclosure act,' that is, it brings environmental issues to the attention of the public" (Auerbach et al., 1976). When it comes to nuclear waste, as stated before, its potential harmful effects on humans is very dangerous. This means that the community has every right to know about any nuclear waste that could cause problems. The more updated and more accurate this EIS is, the better chance that the community is more prepared for any situation to arise. As well as being more prepared, the community also has the chance to further educate themselves on nuclear waste, and ways to protect themselves from it. This EIS really is not just for the NRC or any company; it can majorly impact our society we live in a great way.

As Shawn Zeller states in his article *Nuclear Regulatory Commission*, "... this commission [NRC] is charged with licensing and regulating all nuclear facilities in the United States" (Zeller 2001). This means that

the NRC is responsible for anything nuclear power related, and that includes and ill effects nuclear power may cause. The health effects of nuclear waste on humans can be very harmful, and fatal if exposure is high enough. Alongside these harmful effects comes the retaliation of the victims; in other words, lawsuits can easily arise when it comes to nuclear waste and its harmful effects. Although a possible lawsuit usually is between a community of people, whether it be a lot of people or a small amount, and a company that deals with nuclear waste directly, the whole ordeal can come full circle and end up putting a negative pressure on the NRC. So, not only is it beneficial for U.S. citizens to have an updated EIS, but it has the potential to greatly benefit the NRC as problems such are far less likely to occur.

NEPA, established in 1969, was solely created to protect the environment we live in. Through various policies, it makes sure that what we do as a society affects the environment as little as possible. In an article written in Science magazine, the authors say that, “It [NEPA] was meant to force agencies to ‘insure the integrated use of the natural and social-sciences... in planning and decision-making’” (Bronstein, Baer, Bryan, DiMento, Narayan, 2005). This clearly states that it is the agencies job, in this case the NRC, to have sound research when it comes to the creating of something or planning. When it comes to the update of the EIS in regards to nuclear waste, I think it’s more than obvious that sound research is needed to make this EIS as effective as possible. Going off of that, the EIS needs to be as effective as possible in order to reduce any ill effects, which is the responsibility of the NRC. This is clearly is a matter that is of grave importance and needs to be handled with delicate procedures by the NRC.

I’ve been talking a lot about benefits for both the agency and the community if the NRC was to update the EIS in regards to nuclear waste. Looking at a more economic viewpoint, the cost for nuclear waste disposal is a big factor in this. As Joseph A. Lieberman states, “More money probably has been spent, and more scientific and technological effort concentrated, on facilities, operations, and research and development with regard to this industrial waste than on any other industrial contaminant we have know” (Lieberman, 1957). Although this was written in 1957, this statement is most definitely still on point today as nuclear energy is being used more than ever nowadays. If one were to look at the normal trends of technology, as times passes,

the efficiency of said technology decreases. As efficiency decreases, the less productive the technology is. In this case, that means that the technology will not dispose the waste as much as it could in the past, so this means more money is needed to keep the technology running at full performance. This updated EIS can give the means to new technology, thus creating a less costly way to dispose of waste. The upfront cost of new technology is never cheap, but its long-term productivity is much higher, which means less money needed in the future, which makes it worth the upfront cost.

As stated before, nuclear waste is just spent nuclear fuel. What does this nuclear fuel do for us exactly? The amount of energy put out by even the smallest amount of nuclear fuel is incredible, and energy is beyond crucial to everyday life. Energy is what enables us to do everyday activities, such as sit in a room with light, do laundry, drive a car; energy is involved in about 99% of what we do everyday. Nuclear energy is a huge breakthrough in human technology, because we can get so much energy from so little fuel. The efficiency and relative ease of this process is truly amazing. Author Alvin Weinberg talks about how society today must correctly chose what is essential to human survival and what is not. “I would put nuclear energy and pesticides in the first category, supersonic transports in the second” (Weinberg, 1970). Weinberg means that category one is the one that holds the things that are essential to human survival. What I’m trying to say with all of this is that nuclear energy is so precious to us that to give it anything less than our full attention is not necessarily an illegal or evil act, but rather a very questionable move on our part. This updated EIS needs to be written in order to for us, as a human race, to morally deal with a possible problem that can put many lives at stake. I am not saying that if this updated EIS is not signed that we fail at being humane. It just feels wrong to have this major power in our hands and not give it our best in order to make it work at the best level it can possibly perform at. As well as being morale, it’s also just relatively not a good idea from a health aspect to let such potentially dangerous power go unnoticed.

As I just explained, the power of nuclear energy is astonishing. It’s ability to provide such massive amounts of energy with such little amount of fuel is truly a milestone for human existence. This amazing technology, however, as well as many other pieces of technology always has the potential to become “better.”

This means that we constantly are researching and testing new ways that the technology can be more productive and be more efficient. With this movement forward in technology, that means that new standards must be in place so that it is up to date with the updated technology. Nuclear waste disposal technology has most definitely moved forward in the past decade or so. It is time that the NRC creates an updated EIS so that everything is up to current standards. To have an out of date EIS is pretty dangerous actually, as it probably misses a lot of potential hazards that have occurred.

Throughout this comment, I have shown how critical it is that we have nuclear energy as an option. Energy is beyond critical is all of our daily life activities; every last person in this country uses so much energy per day, that to have none would mean human existence ceases to exist. If we are going to readily use nuclear energy as a way to provide so much of said energy to us, then we also have a responsibility to uphold. We cannot assume that we can have such great power and get away with not having to upkeep anything dealing with it. I'm talking mostly about the waste it produces; it is highly toxic. Since it is the NRC's job to be the fixed point for any nuclear energy related activities, it is also their job to be in charge of the nuclear waste. The NRC's proposal to update the Waste Confidence Generic Environmental Impact Statement is of utmost importance to be done as soon as possible. I say this because of benefits for the community and the agencies, the necessity of this, and how it's basically the NRC's job to do such action in order to do their jobs in the best way possible. In conclusion, I am all for the updating of this EIS, and I hope that everyone else sees just how important this is.

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"Rulemaking1CEm Resource" <Rulemaking1CEm.Resource@nrc.gov>
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