

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Friday, November 15, 2013 10:47 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: Docket ID NRC-2012-0246 - NUCLEAR WASTE CONFidence

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**SECY DOCKET DATE:** 11/15/13  
**TITLE:** Waste Confidence—Continued Storage of Spent Nuclear Fuel  
**COMMENT#:** 00186

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**From:** David Agnew [mailto:d-agnew@comcast.net]  
**Sent:** Friday, November 15, 2013 7:53 AM  
**To:** RulemakingComments Resource  
**Subject:** Docket ID NRC-2012-0246 - NUCLEAR WASTE CONFidence

I read about half of the following at the NRC public WASTE CONFidence hearing held in Chelmsford, MA recently, and wish to add my entire statement to the record.  
Docket ID NRC-2012-0246 - NUCLEAR WASTE CONFidence

Comments for the NRC regarding "NUCLEAR WASTE CONFIDENCE"

I am grateful that the public comment period was extended for nearly a year. However the fact that such a brief comment period was initially proposed indicates the NRC's disregard for public involvement.

None of the following comments are personal - when I say "you", I'm referring to the agency and to the commissioners as a whole.

**It is telling that the NRC uses the term "confidence" when talking about safeguarding nuclear waste.** Going BACK in time, one million years takes us to the Calabrian stage of the Pleistocene era, a period of which we know very little, hundreds of thousands of years prior to the emergence of the Neanderthal. But going forward in time, we know little if anything about events a decade from now, and we have no way to know anything about conditions ten thousand centuries from now. **That you dare use the word 'confidence' when talking about safeguarding radwaste for a period of time five hundred times greater than the Christian era is preposterous!**

Lest you think I have nothing good to say about your "regulatory" agency, you may be glad to hear that I give the NRC very high marks... but only for hubris and audacity. I wish to make it very clear how much contempt I have for your hubris and audacity, but I recognize that although you are insensitive to the cancers and birth defects of many thousand generations to come, your staff are sensitive beings. In deference to this sensitivity I have redacted all expletives from these comments.

You have estimated the risk of a core melt with containment breach at a GE Mark 1 BWR at 1 in 1 million reactor-years. Actual reality has revealed the risk to be 1 in 352 reactor-years, 2,841 times more likely than NRC prediction.

You want us to believe another EXPLETIVE probabilistic risk assessment (PRA) which assures us that a high level radwaste pool can't be drained by an aircraft carrying C4. I live near a EXPLETIVE Mark 1 reactor that's on a flight path for a major airport - and there are no airspace restrictions. Even a partial drain down is likely to result in an inextinguishable filthy EXPLETIVE uranium and plutonium fire. The only thing between a 747 and the SFP is a thin sheet metal roof. It's not safe now, and I have no confidence that it will remain safe until it has thoroughly decayed (about half-million years).

Sorry, but there is no reason for me to believe your PRAs.

The nuclear industry promised safe, cheap, electricity from reactors which would operate for 40 years during which time its hellishly godawful wastes would be safely removed. The industry has delivered on none of that, instead leaving its EXPLETIVE waste scattered across the country, a gift to accompany increased cancer rates for yet-unborn generations. You have allowed the owners to operate with insufficient funds to properly decommission their EXPLETIVE cancer-factories until such time as the financial climate MAY allow it.

The NRC colludes with the industry to enable all of this, and for what? For industry profits and little else. We don't need nuclear power - it is completely unnecessary in Massachusetts, and the nation can convert to renewable energy for the same money now spent on nuclear and fossil fuels.

For a hazard that will last for thousands of years, 'waste confidence' is an oxymoron. For a hazard that will last hundreds of thousands of years, use of the word 'confidence' is simply moronic. We are seven decades into 'too cheap to meter' and no one knows what to do with the industry's toxic waste. Whether the problem is NIMBY or scientific, the result is the same: no one knows what to do with the industry's EXPLETIVE toxic waste.

Could people be evacuated safely if there's a fire at a waste fuel pool? Past experience with comparatively minor accidents like Windscale, Three Mile Island, Chernobyl and Fukushima says no. But in order to maximize the externalization of radwaste costs, within just a couple of years of final reactor shutdown you will not require evacuation planning. So anyone with a shred of commonsense can see that 'safe' and 'NRC radwaste plans' fit in one sentence no better than 'containment' and 'vent' do.

You have assumed that cask pads, inner canisters, and the dry casks will be replaced once every 100 years, for hundreds of millennia. Since Spent Fuel Pools (SFP) will have been dismantled by, at most, 60 years after permanent reactor shutdown, you further assume that dry transfer systems will be built and replaced every 100 years. Will degradation of irradiated nuclear fuel prevent the proper execution of such transfer operations? No one knows and you don't care.

NRC staff has said it would take 7 years to properly complete the GEIS. Given varied power station designs, geographic features such as rivers, oceans, dams, flood zones, population, flight paths, SFPs inside or outside of containment, containments that cannot contain, et cetera, each reactor is unique. Therefore there should be no GEIS, every storage site should require a properly completed site-specific Environmental Impact Statement (EIS).

All relicenses issued to date should be rescinded pending compliance with realistic new standards. No new licenses to generate additional EXPLETIVE radwaste should be allowed. And no additional radwaste should be generated - it is immoral to create deadly toxins that will remain a threat for so long when we have no real plan for safekeeping them over their hazardous 'lifespan'.

Public meetings for the EIS should be in every reactor community and analysis must include: sabotage and terrorist acts; current and future leaks from SFPs.

Hardened On Site Storage, with earthen berms to isolate casks, should be required for all High Level Reactor Waste (HLRW) cool enough to store dry.

For a greater margin of safety, low density configuration of the SFP should be required for all HLRW not placed in casks.

The EIS must consider the risks of pool fires.

The EIS must consider the risks of current dry cask storage. Lack of quality assurance for design and fabrication of dry casks casts doubt on the structural reliability of current casks, most of which are stored outdoors in plain sight, and are not designed to withstand terrorism or severe earthquakes. Accidents with dry casks have occurred.

The EIS must consider seismic risks to dry cask storage.

I also endorse the Principles for Safeguarding Nuclear Waste at Reactors from the Institute for Energy and Environmental Research.

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