Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Wednesday, November 20, 2013 1:51 PM
To: Rulemaking1CEm Resource
Subject: FW: Docket ID NRC-2012-0246

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TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel
COMMENT#: 00224

From: JimGarb [mailto:jimgarb@comcast.net]
Sent: Tuesday, November 19, 2013 5:55 PM
To: RulemakingComments Resource
Subject: FW: Docket ID NRC-2012-0246

TO: Nuclear Regulatory Commission
RE: Docket ID # NRC-2012-0246 - Waste Confidence Generic EIS

November 19, 2013

As a physician board certified in Occupational and Environmental Medicine, it is my opinion that the use of nuclear energy for electric power, with the attendant problems of nuclear waste generation and storage, represents the single greatest threat to public health that we face in this country. For a few of the 100 nuclear reactors located around the US, including the Pilgrim Nuclear Power Station in Plymouth Massachusetts, the danger is magnified because, in the event of a nuclear accident, a significant population (240,000 on Cape Cod in the off-season) would have to drive toward the disaster in order to escape from it due to limited egress routes.

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 an unacceptable leap of faith. 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 has figured out what to do with the industry's 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 suggests not. But in order to maximize the externalization of radioactive waste costs, within just a couple of years of final reactor shutdown the NRC will not require evacuation planning. This is reckless disregard for public safety and public health.

The NRC's assumption that "indefinite storage" at reactor sites can go on literally forever, without loss of institutional control, is absurd. As has been pointed out by others, 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. NRC assumes 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, NRC further assumes 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 the NRC appears to disregard this concern. Can anyone seriously believe that the safekeeping of radioactive waste will continue for 240 millennia or even longer?

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. Rather, 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 radioactive waste should be allowed. And no additional radioactive waste 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.

Finally the Pilgrim Nuclear Power Station is an old facility with the same flawed reactor design as at Fukishma, poorly sited, and plagued by mechanical difficulties. It should be shut down immediately before the unthinkable happens.

Sincerely,

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