

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Monday, November 25, 2013 10:52 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: Docket ID No. NRC-2012-0246

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**TITLE:** Waste Confidence—Continued Storage of Spent Nuclear Fuel

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**From:** Lynne Harkins [<mailto:L.Harkins@charter.net>]  
**Sent:** Wednesday, November 20, 2013 8:53 PM  
**To:** RulemakingComments Resource  
**Subject:** Docket ID No. NRC–2012–0246

To the Nuclear Regulatory Commission:

Thank you for this opportunity to comment on Docket ID No. NRC–2012–0246.

I want to make it known that I am part of the ever-expanding list of people who vigorously support the need for re-evaluating policy and practices regarding nuclear power plants and the threats posed by their radioactive waste storage. I affirm my support for comments by Mothers for Peace of San Luis Obispo in their call for a less perilous, more well-considered/science-based handling of the problems of radioactive nuclear waste. For those of us who live in the shadow of these poisonous waste stations, it is vitally important that the NRC act as if their loved ones have nuclear power plants-with overcrowded,unprotected spent fuel pools- looming in their neighborhoods.

The U.S. Nuclear Regulatory Commission (NRC) has “confidence” that the high-level radioactive nuclear waste problem will be solved sometime in the future. So the “regulator” declared that it could continue to give 20-year license extensions to aging, brittle, accident-prone nuclear reactors without an objective, scientific study of safety, storage and disposal of thousands of tons of radioactive waste.

***We don't agree. Neither did the Court of Appeals in Washington, D.C., which overturned the NRC waste confidence ruling.***

In response, the NRC has written a *new* Waste Confidence Environmental Impact Statement, restating the same unsupported, unsafe, industry-friendly “confidence” in new packaging.

In commenting on the NRC's new Waste Confidence EIS, there are some common sense imperatives which immediately come to mind:

**A. Stop making nuclear wastes.**

1. Without a scientifically proven solution for safely disposing of nuclear waste, we must stop making it. Clean, renewable sources of electricity are readily available and affordable, so there is no excuse for continuing to rely on nuclear power.

2. Waste Confidence is a Radioactive ConGame. The purpose of NRC's Waste Confidence rule is to streamline nuclear plant licensing by ignoring the million-year, multi-billion dollar problem of what to do with radioactive waste. The only problem Waste Confidence solves is how to permit nuclear plants to continue making this waste when there is no solution for it.

3. Obey the Court's Ban on Licensing Nuclear Reactors. There is no safe storage solution for nuclear waste, and NRC's new Waste Confidence policy is no more credible than the one the courts threw out. There is no safe dose of radiation, and to pursue licensing on the base of Waste Confidence is illegal and immoral.

**B. Accelerate the schedule for transferring spent fuel rods from overcrowded spent fuel pools into dry casks.**

1. Some irradiated fuel pools in the U.S. currently hold up to 9 times the amount of spent fuel for which they were designed.

2. The pools are not protected by redundant emergency makeup and cooling systems or housed within robust containment structures having reinforced concrete walls several feet thick.

3. Irradiated fuel casks can withstand environmental disasters that spent fuel pools cannot, as evidenced by the continued function of the dry casks at Fukushima. The casks survived the 9.0 quake and continue to protect the irradiated fuel, even though the tsunami flooded them. These containers have not exploded; are not on fire; are not catastrophically leaking and do not require ongoing addition of liquid to cool. On the face of it, they are outperforming the pools on the site.

4. Dry casks have the advantage of passive cooling via airflow, making them less vulnerable to natural disaster and sabotage.

5. Spent fuel pools are attractive targets for terrorists and that has not been adequately considered!

In summary, the "Waste Confidence" EIS must be revised to include and to consider all of the above issues. The public deserves and will accept nothing less!

Sincerely,

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