

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Monday, November 25, 2013 11:11 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

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

**COMMENT#:** 00252

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**From:** Maradel Gale [<mailto:mkgale@uoregon.edu>]

**Sent:** Saturday, November 23, 2013 11:25 PM

**To:** RulemakingComments Resource

**Subject:** Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Hello, NRC:

I live in the state of Washington, where we have a very serious problem with nuclear waste here at Hanford Reservation. The tanks that supposedly were going to contain this virulent mess are leaking and eventually this radioactivity will reach the ground water and the Columbia River, if it hasn't already. Given the secrecy of this entire operation, it is likely there are already more problems than have been admitted with this reservation.

While this is an example of something (creating atomic weapons) that we are probably not doing any longer, there are similar issues with the storage of wastes from commercial nuclear power plants around the country. Another potential "hot spot" for my part of the country is the former Trojan Nuclear Plant, also situated on the Columbia River. There is still nuclear waste being stored on that site, with no place for it to be taken for more permanent and safer storage.

The NRC's "waste confidence" principle was properly struck down by a federal court because, some 60 years into the commercial atomic age, it is patently obvious that there is no foreseeable "solution" for long-term radioactive waste storage that would attain three necessary and basic goals: scientifically-defensible, environmentally-responsible and publicly-acceptable. Not only is there no long-term solution for atomic waste in hand or on the horizon, the shorter-term programs

now in place are inadequate from a public safety standpoint, and do not offer the requisite confidence to allow continued generation of radioactive waste.

**Nothing in the NRC's Draft NUREG-2157 changes these realities.** It is apparent that rather than undertake a thoughtful re-examination of the NRC's radioactive waste policies and priorities-- which admittedly might have taken considerable time and effort, the NRC chose to hurriedly slap together a document whose only purpose is to provide a thin veneer of a cover to overturn the agency's forced moratorium on reactor licensing and renewal procedures.

The NRC is surely the only regulatory body in the world that would argue that indefinite— essentially permanent—storage of high-level radioactive waste in fuel pools and dry casks provides “confidence” that this waste will never cause a threat to public health and safety. By their very nature, neither casks nor fuel pools are designed for permanent storage. Rather than insist on a robust waste management system intentionally designed to handle conceivable accidents whether through equipment failure, natural disasters, operator error or any other cause that could release radioactive materials to the environment, the NRC's draft document ultimately relies on the low probability of an accident to justify its position that reactor licensing and relicensing may resume.

**Low probability is not a substitute for protection,** as the world already has learned from Fukushima to Chernobyl to Bhopal and Love Canal.

Ending radioactive waste generation is the single most important step we can take to minimize the risks surrounding its storage, and the NRC should revise its Waste “Confidence” document to ensure the speediest possible end to that generation. In the interim, NRC must mandate the immediate movement of waste that has been sufficiently cooled out of the pools to dry storage containers, and those should be hardened on-site (HOSS) to improve safety and security.

Thank you for the opportunity to comment.

Sincerely,

Maradel K. Gale  
Bainbridge Island, Washington

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