

WCRM-GEIS4CEm Resource

From: Pam Blake [pamblake@aol.com]
Sent: Friday, November 22, 2013 5:33 PM
To: RulemakingComments Resource
Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

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. Both are only an earthquake or other act-of-nature away from a life-threatening accident. Both are susceptible to human error and equipment failure.

Rather than insist on a robust waste management system intentionally designed to handle such all-too-conceivable accidents, 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, Bhopal to 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. Using an energy source that produces such long-lived toxicity to toast breakfast is no longer sane when renewable, clean energy generation has come such a long way in the past few decades. In the interim, NRC must mandate the immediate movement of waste that has been sufficiently cooled out of pools to dry storage containers, and those should be hardened on site (HOSS) to improve safety and security.

Pam Blake

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