

WCRM-GEIS4CEm Resource

From: Laura Jordan [laurajor@gmail.com]
Sent: Friday, November 22, 2013 6:22 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 by now, 60 years into the commercial atomic age, it has become clear that there is no foreseeable "solution" for long-term radioactive waste storage that is scientific defensible, environmentally responsible, and publicly acceptable.

Not only is there no long-term solution for atomic waste 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 (but would have been time and effort well spent),-- the NRC chose to quickly fashion a document whose sole purpose appears to be to provide a thin veneer of pretext 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.

This is unacceptable. Low probability is not a substitute for protection, as the world already has learned time and again through the examples of Fukushima, Chernobyl, 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.

Laura Jordan

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