

WCRM-GEIS4CEm Resource

From: Calvin Smedley [cal@getsmartmail.com]
Sent: Friday, November 22, 2013 6:40 PM
To: RulemakingComments Resource
Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

We believe the NRC's "waste confidence" principle was properly struck down by a federal court because, some 60 years after the commercialization of atomic energy, there is no foreseeable "solution" for long-term radioactive waste storage that attains the three, necessary, basic goals of being: (1) scientifically-defensible, (2) environmentally-responsible and (3) 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. Rather than undertake a thoughtful re-examination of the NRC's radioactive waste policies and priorities, which would have taken a considerable amount of 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's contention that indefinite, essentially permanent, storage of high-level radioactive waste in fuel pools and dry casks, built for temporary containment, promotes public "confidence" that this waste will never cause a threat is incredible for a government agency directly responsible for public health and safety.

Rather than insist on a robust waste management system, intentionally designed to handle conceivable accidents from 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 general, low probability of any accident occurrence to justify its position that reactor licensing and relicensing may resume.

Low probability is not a substitute for protection. They were "playing the odds" at Fukushima, Chernobyl, Bhopal and The Love Canal.

Ending the generation of radioactive waste 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 of that generation. In the interim, the NRC must mandate the immediate movement of waste that has been sufficiently cooled out of storage pools into dry containers which need to be hardened on-site (HOSS) to improve safety and security.

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