

WCRM-GEIS3CEm Resource

From: Riverkeeper [info@Riverkeeper.org] on behalf of Sally Shaw [acer8sac@comcast.net]
Sent: Wednesday, December 04, 2013 7:55 PM
To: RulemakingComments Resource
Subject: Docket ID NRC-2012-0246

Dec 4, 2013

Secretary U.S. Nuclear Regulatory Commission Rulemakings and Adjudications Staff Washington, DC 20555-0001

ATTN: Secretary Rulemakings and Adjudications Staff,

NRC's draft EIS fails to properly analyze all reasonable alternatives and all feasible mitigation measures that could reduce safety risks associated with on-site nuclear waste storage. For example, NRC has not considered, but should have, the possibility of not relicensing operating reactors so that no additional nuclear waste is produced. NRC has also improperly failed to examine how the expedited transfer of spent fuel from dangerously overcrowded pools to dry casks would substantially reduce safety and accident risks.

The NRC should perform site-specific risk assessments and environmental impact statements for each U.S. reactor. The reason for this is perfectly exemplified by the Indian Point nuclear power plant, which is unique in several ways:

- Indian Point sits in a more densely populated area than any other U.S. plant, with more than 20 million people living within 50 miles.
- The plant sits adjacent and nearby to State designated significant fish and coastal wildlife habitats.
- Since at least the 1990s, radioactive toxins such as tritium and strontium-90 have been leaking from at least two spent fuel pools at Indian Point into the groundwater and the Hudson River. The pools at Indian Point are already compromised and are sure to continue causing environmental impacts in the future. For example, in January 2007 Strontium-90 was detected in four out of 12 Hudson River fish tested.
- Parts of New York City's drinking water supply, which provides 9 million New Yorkers with unfiltered drinking water, are less than 15 miles away from Indian Point.
- Indian Point sits at the intersection of two active earthquake faults; these faults could produce upwards of a 7.0 magnitude earthquake, which Indian Point was not initially built to withstand.
- Indian Point's spent fuel pools, which were never designed to hold the nearly 2,000 tons of toxic waste now stored at the plant, are highly vulnerable to terrorism and accidents.

It is clear that the nuclear waste stored at Indian Point poses a unique risk, which warrants site-specific examination.

It is imperative for NRC to conduct a legally sound and complete environmental review as mandated by the U.S. Court of Appeals. This review must not generically waive off critical

risks and impacts associated with the prospect of centuries of nuclear waste storage and individual reactor sites, and must fully consider site-specific concerns, as well as all feasible alternatives and mitigation measures, including not licensing/relicensing plants in order to avoid the production of any additional waste, and requiring the expedited removal of spent fuel from pools and into dry casks to reduce safety risks of pool storage.

Thank you for your consideration.

Respectfully,

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Federal Register Notice: 78FR56775
Comment Number: 881

Mail Envelope Properties (22505217.1386204890969.JavaMail.www)

Subject: Docket ID NRC-2012-0246
Sent Date: 12/4/2013 7:54:50 PM
Received Date: 12/4/2013 7:54:52 PM
From: Riverkeeper

Created By: info@Riverkeeper.org

Recipients:

"RulemakingComments Resource" <RulemakingComments.Resource@nrc.gov>
Tracking Status: None

Post Office: app339

Files	Size	Date & Time
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