

WCRM-GEIS4CEm Resource

From: Robert Johnsrud [robbej@gmail.com]
Sent: Friday, November 22, 2013 7:15 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 is based on a fallacy, that being that the possibility of an accident is low. We have seen the evidence of what occurs when the NRC has disallowed the consideration of what were presumed to be low likelihood events. In both the siting and licensing proceedings of Three Mile Island Units 1 and 2, the citizen intervenors from the Environmental Coalition on Nuclear Power were prohibited from raising the issues of a serious accident or more serious meltdown because, in the AEC's and then NRC's judgement such an accident was too unlikely to consider. And then that very accident occurred. The citizens knew what they needed to be concerned about, and attempted to raise that concern. To dismiss a worst-case scenario, or even a bad scenario, from consideration is simply the wrong way to go about setting public policy.

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 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, as the spent-fuel pools at Fukushima so sadly show us.

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. Again, I reiterate that failure to consider accidents will lead to those accidents: nuclear power is not fail-safe, and low probability is not a substitute for protection.

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.

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