

WCRM-GEIS4CEm Resource

From: David B. Chandler [chandler@math.udel.edu]
Sent: Friday, November 22, 2013 7:48 PM
To: RulemakingComments Resource
Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

Some sixty years into the commercial atomic age, the NRC's ``waste confidence'' principle was struck down properly by a federal court, because it is 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 reexamination of the NRC's radioactive waste policies and priorities--which admittedly might have taken considerable time and effort, the NRC chose to slap together a document whose only purpose is to provide a 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.

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 might resume.

Low probability is not a substitute for protection, as the world already has learned from Fukushima to Chernobyl to 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 end to that generation possible. 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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Federal Register Notice: 78FR56775
Comment Number: 4525

Mail Envelope Properties (1995210543.22005.1385167701343.JavaMail.tomcat)

Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence
Generic Environmental Impact Statement
Sent Date: 11/22/2013 7:48:21 PM
Received Date: 11/22/2013 7:48:21 PM
From: David B. Chandler

Created By: chandler@math.udel.edu

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

Post Office: vweb102.salsalabs.net

Files	Size	Date & Time
MESSAGE	2529	11/22/2013 7:48:21 PM

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received: