

WCRM-GEIS4CEm Resource

From: Betty J. Van Wicklen [g10121@care2.com]
Sent: Friday, November 22, 2013 8:45 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, some 60 years into the commercial atomic age, it is patently 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 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 a 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 may resume.

Low probability is not a substitute for protection, as the world already has learned from Fukushima to Chernobyl to Bhopal and Love Canal. Increasingly extreme weather as well as earthquakes and volcanic activity in new areas makes minimizing the "low probability of an accident" an insult to anyone, anywhere, who has suffered any of the results of these natural accidents, many of which have been powerful enough already to change the shape of seashores and the earth's tilt on its axis. This sounds like the pap released by the Oil industry who would also like us to believe that further "accidents" and spills won't happen with drilling or fracturing! If we trust this viewpoint, we are living in a fools' paradise.

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. NO transport of such waste should be made by rail or highway.

Thank you for your attention.

Betty J. Van Wicklen

NY

Federal Register Notice: 78FR56775
Comment Number: 4985

Mail Envelope Properties (1247593625.2688.1385171100484.JavaMail.tomcat)

Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence
Generic Environmental Impact Statement
Sent Date: 11/22/2013 8:45:00 PM
Received Date: 11/22/2013 8:45:01 PM
From: Betty J. Van Wicklen

Created By: g10121@care2.com

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

Post Office: vweb65.salsalabs.net

Files	Size	Date & Time
MESSAGE	3218	11/22/2013 8:45:01 PM

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