

WCRM-GEIS4CEm Resource

From: Patricia Blochowiak [pblochowiak@gmail.com]
Sent: Saturday, November 23, 2013 6:36 AM
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 struck down by a federal court because, some 60 years into the commercial atomic age, there is no foreseeable "solution" for radioactive waste storage that would be scientifically-defensible, environmentally-responsible and publicly-acceptable.

The shorter-term programs now in place are also inadequate and do not offer the requisite confidence to allow continued generation of radioactive waste.

The NRC's Draft NUREG-2157 does not change these realities.

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 throw together a document whose purpose is to provide a veneer of cover to overturn the agency's forced moratorium on reactor licensing and renewal procedures.

The NRC is the only regulatory body 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. 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.

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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Federal Register Notice: 78FR56775
Comment Number: 6306

Mail Envelope Properties (526758886.82183.1385206577405.JavaMail.tomcat)

Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence
Generic Environmental Impact Statement
Sent Date: 11/23/2013 6:36:17 AM
Received Date: 11/23/2013 6:36:18 AM
From: Patricia Blochowiak

Created By: pblochowiak@gmail.com

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

Post Office: vweb107.salsalabs.net

Files	Size	Date & Time
MESSAGE	2255	11/23/2013 6:36:18 AM

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