

WCRM-GEIS4CEm Resource

From: William Davis [rees@hvc.rr.com]
Sent: Saturday, November 23, 2013 9:23 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 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 the very long-term problem of atomic waste in hand or on the horizon, the shorter-term programs now in place are utterly 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. The waste is a ticking time bomb that will be dangerous for tens of thousands of years.

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.

Instead, we need to shut down ALL of the nuclear power plants until there is a solution to the problem of nuclear waste. Right now, at Fukushima, the world is in danger because TEPCO is going to try to remove the spent fuel rods from a damaged building and may fail, causing a detonation or some other massive release of radiation. These idiot corporations have no right or authority to risk the health of the world as they do!

The NRC is surely the only regulatory body (and a complete joke) 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. We need to shut down ALL of the damned nuclear plants NOW!

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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