

WCRM-GEIS4CEm Resource

From: Elisa DeBoer [edpintar@aol.com]
Sent: Saturday, November 23, 2013 10:56 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 there is no foreseeable "solution" for long-term radioactive waste storage that would attain three necessary and basic goals.

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. Low probability is not a substitute for protection, as the world already has learned from Fukushima to Chernobyl to Bhopal and Love Canal.

Rather than undertake a thoughtful re-examination of the NRC's radioactive waste policies and priorities, the NRC chose to offer a document whose only purpose is to provide cover to overturn the agency's forced moratorium on reactor licensing and renewal procedures.

Arguing that indefinite storage of high-level radioactive waste in fuel pools and dry casks protects the public health and safety is a fallacy. By their very nature, neither casks nor fuel pools are designed for permanent storage.

The NRC's draft document relies on the low probability of an accident to justify its position that reactor licensing and relicensing may resume. It should have insisted 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.

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 arrival to that goal. 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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