

WCRM-GEIS4CEm Resource

From: Ned Flaherty [ned_flaherty@msn.com]
Sent: Saturday, November 23, 2013 11:18 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 the last 60 years has proven it to be a failure -- it is not scientifically defensible, environmentally responsible and, or publicly acceptable.

There is no long-term solution, and shorter-term programs don't protect public safety.

Nothing in the NRC's Draft NUREG-2157 changes these realities.

Instead of safely managing radioactive waste, NRC chose to overturn the agency's forced moratorium on reactor licensing and renewal procedures.

NRC is still falsely claiming that "permanent" storage of high-level radioactive waste in fuel pools and dry casks is wise. It is not. Neither casks nor fuel pools are permanent.

Any robust waste management system must be able to handle conceivable accidents (equipment failure, natural disasters, operator error), but NRC's draft plan ultimately relies on low risk to excuse more licensing.

Low probability is no substitute for protection, as proven at Fukushima, Chernobyl, Bhopal, and Love Canal.

Ending radioactive waste generation is the single most important step toward minimizing the storage risks, so the NRC must revise its Waste "Confidence" plan to ensure the speediest possible end to that generation.

In the interim, NRC must mandate the immediate movement of cooled waste out of the pools to hardened, on-site dry storage containers.

Ned Flaherty

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