

WCRM-GEIS4CEm Resource

From: Robert McNair [rlmcnair@q.com]
Sent: Saturday, November 23, 2013 2:33 PM
To: RulemakingComments Resource
Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

I am concerned about nuclear waste, radiation, and public health. NRC's "waste confidence" principle was struck down by a federal court 60 years into the commercial atomic age. Clearly, 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 for public safety, and do not offer the requisite confidence to allow continued generation of radioactive waste.

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

Rather than re-examination of NRC's radioactive waste policies and priorities, NRC has chosen to offer a document whose purpose is apparently to overturn the agency's forced moratorium on reactor licensing and renewal procedures.

NRC cannot claim that indefinite, 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.

NRC, please 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. Do not rely on an allegedly low probability of an accident to justify your 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.

It would be responsible to research the possibility of small triple-safe reactors that CONSUME as fuel, rather than generate, radioactive waste.

Thanks for your help with this vital matter.

Robert McNair

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