

WCRM-GEIS4CEm Resource

From: Martha E. Martin [mauimarta@gmail.com]
Sent: Saturday, November 23, 2013 9:06 PM
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, after 60 years into the commercial atomic age, there is no foreseeable "solution" for long-term radioactive waste storage that meets 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 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.

It is apparent that rather than undertake a thoughtful re-examination, the NRC wrote a document that provides a cover to overturn the agency's forced moratorium on reactor licensing and renewal procedures.

How can the NRC say 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? Casks and fuel pools aren't designed for permanent storage.

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.

Martha E. Martin

HI

Federal Register Notice: 78FR56775
Comment Number: 7646

Mail Envelope Properties (857619848.9475.1385258745135.JavaMail.tomcat)

Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence
Generic Environmental Impact Statement
Sent Date: 11/23/2013 9:05:45 PM
Received Date: 11/23/2013 9:05:45 PM
From: Martha E. Martin

Created By: mauimartha@gmail.com

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

Post Office: vweb69.salsalabs.net

Files	Size	Date & Time
MESSAGE	1983	11/23/2013 9:05:45 PM

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