

## WCRM-GEIS4CEm Resource

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**From:** Felix Prael [felixprael@gmail.com]  
**Sent:** Saturday, November 23, 2013 8:35 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. 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 basic goals: scientific defensibility, environmental responsibility and public acceptance.

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 of the NRC's radioactive waste policies and priorities, the NRC chose to slap together a document, the only purpose of which is to overturn the agency's forced moratorium on reactor licensing and renewal procedures.

The NRC is surely the only regulatory body 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. 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 disaster, 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 re-licensing may resume.

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

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.

Meanwhile, 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.

Felix Prael

CA

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