

WCRM-GEIS4CEm Resource

From: Olivia Lim [olivialim.us@gmail.com]
Sent: Sunday, November 24, 2013 4:34 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 struck down because, some 60 years into the atomic age, it is obvious that there is no foreseeable solution for 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, the shorter-term programs 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 this.

Rather than undertake a thoughtful re-examination of the NRC's radioactive waste policies and priorities--which might have taken time and effort, the NRC chose to hurriedly slap together a document whose only purpose is to provide a thin cover to overturn the agency's forced moratorium on reactor licensing and renewal procedures.

The NRC is surely the only regulatory body that would argue that indefinite--essentially permanent--storage of radioactive waste in fuel pools and dry casks provides "confidence" that this waste will never threaten public safety. By their nature, neither casks nor fuel pools are designed for permanent storage.

Rather than insist on a robust waste management system designed to handle accidents whether through equipment failure, natural disasters, operator error or any cause that could release radioactive materials, the NRC's draft document 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 has learned from Fukushima to Chernobyl to Bhopal and Love Canal.

Ending radioactive waste generation is the most important step 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 to dry storage containers, and those should be hardened on-site (HOSS) to improve safety and security.

Olivia Lim

CA

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