

WCRM-GEIS4CEm Resource

From: Terry Burns [tbscpbsc@satx.rr.com]
Sent: Sunday, November 24, 2013 10:46 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, 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 be safe for thousands of years, scientifically-defensible, environmentally-responsible and publicly-acceptable.

The short-term storage programs now in place are inadequate and leave the public near nuclear power plants at constant risk of Fukushima like problems. Indefinite--essentially permanent--storage of high-level radioactive waste in fuel pools and dry casks IN NO WAY provides "confidence" that this waste will never cause a threat to public health and safety. By their very nature, neither casks nor fuel pools are designed for permanent storage. There should be no more generation of radioactive waste in this untenable situation.

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

Rather than 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, 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, Love Canal and 9/11.

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. Those containers should also remain on site until a permanent--NOT INTERIM--new storage site can be created. Until then the goal of NRC should be to systematically wind down and close the nuclear power plants that are reaching the end of their lives, so that more waste will not be generated.

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