

## WCRM-GEIS4CEm Resource

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**From:** Marcia Halligan [cocoon@mwt.net]  
**Sent:** Sunday, November 24, 2013 10:18 AM  
**To:** RulemakingComments Resource  
**Subject:** Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

A federal court properly stuck down the NRC's "waste confidence" principle because, some 60 years into the commercial atomic age, it becomes patently obvious that no foreseeable "solution" exists for long-term radioactive waste storage that would attain three necessary and basic goals: scientifically-defensible, environmentally-responsible and publicly-acceptable.

Not only do we lack a long-term solution for atomic waste in hand or on the horizon, the shorter-term programs now in place remain woefully inadequate from a public safety standpoint. They do not offer the requisite confidence to allow continued generation of radioactive waste.

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

Apparently rather than conducting a thoughtful re-examination of the NRC's radioactive waste policies and priorities--which admittedly might require considerable time and effort, the NRC chose to hurriedly slap together a document whose only purpose would be to provide a thin veneer of a cover to overturn the agency's forced moratorium on reactor licensing and renewal procedures.

Surely no other regulatory body in the world but the NRC 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. By their very nature, neither casks nor fuel pools were not designed for permanent storage.

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 does not substitute for protection, as the world already learned from Fukushima to Chernobyl to Bhopal and Love Canal. Also even one serious accident threatens great damage and danger.

Ending radioactive waste generation would be the single 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 sufficiently cooled out of the pools to dry storage containers, and those should be hardened on-site (HOSS) to improve safety and security.

Marcia Halligan

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