

WCRM-GEIS4CEm Resource

From: DENNIS R. NELSON, Energy-Environmental Researcher [dennisonelson987@yahoo.com]
Sent: Monday, November 25, 2013 11:41 AM
To: RulemakingComments Resource
Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

The US Nuclear Regulatory Commission's (USNRC's) "so-called 'waste confidence' principle" was properly struck down by a federal court because, almost 71 years into the "commercial 'atomic age,'" it is patently obvious that there is no foreseeable "solution" for longer-term high-level radioactive waste management which would attain three necessary and basic goals: [1] Scientifically Defensible, [2] Environmentally Responsible, and [3] Publicly Acceptable.

Not only is there no longer-term solution for high-level radioactive 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 this radioactive waste.

Nothing in the USNRC's Draft NUREG-2157 changes these realities!

It is apparent that, instead of undertaking a thoughtful re-examination of the USNRC's high-level radioactive waste policies and priorities--which admittedly might have taken considerable time and effort, the USNRC chose to hurriedly slap together a document whose only purpose is to provide a thin veneer of a cover to overturn the agency's forced moratorium on nuclear reactor licensing and renewal procedures.

The USNRC is surely the only regulatory body in the world that would argue that indefinite--essentially permanent--storage of high-level radioactive waste in "depleted ('spent')" 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 are designed for permanent storage!

Rather than insist on a robust high-level radioactive waste management system intentionally designed to handle conceivable accidents whether through equipment failures, natural disasters, operator errors, or any other cause that could release radioactive pollutants to the ecosphere, the USNRC's draft document ultimately relies on the lower probability of an accident to justify its position that nuclear reactor licensing and relicensing may resume.

Lower probability is not a substitute for protection, as the "real world" already has learned from Fukushima (Japan) and Chernobyl (Soviet Ukraine) nuclear reactor disasters--to the Union Carbide/Bhopal (India) chemical plant disaster, the Love Canal (USA) toxic waste disaster, and the Gulf of Mexico (USA) oil spill from the BP-managed 'Deepwater Horizon' drilling rig.

Ending ALL radioactive waste generation is the SINGLE MOST IMPORTANT STEP that we can take to MINIMIZE THE RISKS surrounding its storage. As a result, the USNRC should revise its 'waste confidence' document to make sure that the SPEEDIEST POSSIBLE END to that generation becomes a reality! In the interim, the USNRC MUST MANDATE the immediate movement of radioactive waste that has been sufficiently cooled out of the "depleted ('spent')" fuel pools to dry storage containers--and, in turn, these containers should be "Hardened On-Site Storage (HOSS)" to improve safety and security.

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