

## WCRM-GEIS4CEm Resource

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**From:** Dorothy Brown [dbrown781@gmail.com]  
**Sent:** Monday, November 25, 2013 4:46 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 because it has become patently obvious, after six decades of the "Atomic Age," that there is no foreseeable solution for long-term radioactive waste storage which would be scientifically defensible, environmentally responsible and publicly acceptable.

Not only is there no long-term solution for atomic waste storage or disposal 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 its radioactive waste policies and priorities (which admittedly might have taken considerable time and effort), the NRC chose to rush out a superficial document whose only purpose 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 which 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 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 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. As the world has already learned from Fukushima, Chernobyl, Bhopal and Love Canal, low probability is no substitute for protection.

Ending radioactive waste generation is the single most important step we can take to minimize the risks surrounding its storage. The NRC should revise its Waste "Confidence" document to ensure the speediest possible end to that generation. Meanwhile, the NRC must mandate the immediate movement of sufficiently cooled waste out of the pools to dry storage containers, and those should be hardened on-site (HOSS) to improve safety and security.

Dorothy Brown

CA

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