

## WCRM-GEIS4CEm Resource

---

**From:** Marci Culley [mculley013@gmail.com]  
**Sent:** Tuesday, November 26, 2013 10:40 AM  
**To:** RulemakingComments Resource  
**Subject:** Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

I am writing to express my concerns about (and total lack of confidence) in the NRC's "waste confidence" policy. The NRC's "waste confidence" principle was appropriately struck down by a federal court because (about 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 attain three necessary and basic goals: scientifically-defensible, environmentally-responsible and publicly-acceptable.

Not only is there no long-term solution for atomic 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 radioactive waste.

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

It is clear that rather than undertake a thoughtful re-examination of the NRC's radioactive waste policies and priorities (which might have taken considerable time and effort), the NRC chose to cobble together a document - the purpose of which appears to be to provide a thin veneer of a cover to overturn the agency's forced moratorium on reactor licensing and renewal procedures.

It appears that the NRC is the only regulatory body in the world that would argue that indefinite (essentially permanent) storage of high-level radioactive waste in wet storage (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.

Low probability is not a substitute for protection, as the world already has learned from Fukushima to Chernobyl to Bhopal and Love Canal.

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.

To inspire any semblance of confidence in the NRC's "waste confidence" policy, long-term radioactive waste storage must attain three necessary and basic goals. It must: 1) be scientifically-defensible, 2) environmentally-responsible, and 3) publicly-acceptable. What the NRC has put forward is none of these things. The license moratorium should remain in place until these three goals are met.

Marci Culley

GA

**Federal Register Notice:** 78FR56775  
**Comment Number:** 8735

**Mail Envelope Properties** (1578239939.97661.1385480374472.JavaMail.tomcat)

**Subject:** Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence  
Generic Environmental Impact Statement  
**Sent Date:** 11/26/2013 10:39:34 AM  
**Received Date:** 11/26/2013 10:39:35 AM  
**From:** Marci Culley

**Created By:** mculley013@gmail.com

**Recipients:**  
"RulemakingComments Resource" <RulemakingComments.Resource@nrc.gov>  
Tracking Status: None

**Post Office:** vweb70.salsalabs.net

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3071	11/26/2013 10:39:35 AM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**