

## WCRM-GEIS4CEm Resource

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**From:** Edward Petroski [ep31148@msn.com]  
**Sent:** Wednesday, November 27, 2013 3:11 AM  
**To:** RulemakingComments Resource  
**Subject:** Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

Hey, you puppets that are overpaid and under worked! When are you going to step up and face the fact that the nuke industry is the worst idea to ever be forced down the public's throat with the propaganda of it being "clean" and safe".

This is an horrifically ugly industry that should never have been introduced and certainly should never have been put into play. Face the facts that the world and all it's inhabitants are already in peril from the nuke accidents to date.

We haven't seen the last of the terror of the nuke industry accidents. Even the engineers and scientists don't know for certain how long it will take for the nuke waste and pollution to no longer be a threat to the planet and every living thing. It's a fact that speaks for itself that no one knows what to do now that the imminent disasters have reared their ugly faces and have spewed, and continue to spew their deadly contaminants.

If ever there is still a chance that we and our planet can survive that which has already been thrust upon us by the nuke industry, that chance will be nil should the nuke industry not be stopped in it's tracks.

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 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 apparent that rather than undertake a thoughtful re-examination of the NRC's radioactive waste policies and priorities--which admittedly might have taken considerable time and effort, the NRC 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 reactor licensing and renewal procedures.

The NRC is surely the only regulatory body in the world that 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.

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.

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