

WCRM-GEIS4CEm Resource

From: John LaForge [jmichaellaforge@yahoo.com]
Sent: Wednesday, November 27, 2013 3:23 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 struck down by a federal court because that there is no foreseeable "solution" for long-term radioactive waste storage that would meet three necessary requirements, namely that it be: scientifically sound, environmentally responsible and publicly acceptable.

Even the shorter-term programs now in place for radioactive waste fail to protect the public and fail to offer the requisite confidence that would justify continued generation of reactor waste.

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

Rather than managing a thoughtful re-examination of the NRC's radioactive waste policies and priorities -- which would have taken considerable time and effort -- the NRC chose to hurriedly slap together a document whose only purpose is to provide a paper rationale for lifting the agency's moratorium on reactor licensing and renewal procedures.

The NRC is surely the only regulatory body in the world that would argue that indefinite and essentially permanent storage of highly radioactive waste in cooling pools and dry casks creates "confidence" that this waste will never threaten the public and the environment with radiological disasters. Neither dry casks nor cooling pools are designed for permanent high-level radioactive waste storage.

The NRC has not insisted on a robust waste management system intentionally designed to handle accidents -- whether through equipment failure, natural disasters, operator error or other causes -- that could release radioactive materials to the environment. Instead, the NRC's draft document relies on the "low probability" of an accident to justify its promotion of the renewed licensing and re-licensing of radioactive waste generators (reactors).

The "low probability" of accidental releases is not a substitute for protection, as we all have learned from Fukushima, Chernobyl, Three Mile Island, Sellafield, Bhopal, BP's Gulf Oil Gusher and Love Canal.

Ending radioactive waste generation is the most important step we can take to reduce the risks of its storage. The NRC should revise its "waste confidence" document to ensure the speediest possible end to nuclear waste production. In the interim, NRC must mandate the immediate movement of high-level waste that has been sufficiently cooled from the fuel cooling pools to dry storage containers -- and the casks must be hardened, on-site (HOSS).

John LaForge

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