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From: RulemakingComments Resource
Sent: Monday, December 16, 2013 3:41 PM
To: Rulemaking1CEm Resource
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Subject: PR-51 Waste Confidence
Attachments: 0869 clemons.pdf

**DOCKETED BY USNRC—OFFICE OF THE SECRETARY
SECY-067**

PR#: PR-51
FRN#: 78FR56775
NRC DOCKET#: NRC-2012-0246
SECY DOCKET DATE: 12/11/13
TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel
COMMENT#: 00404

Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 426

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D0014433AE3D78)

Subject: PR-51 Waste Confidence
Sent Date: 12/16/2013 3:41:20 PM
Received Date: 12/16/2013 3:41:23 PM
From: RulemakingComments Resource

Created By: RulemakingComments.Resource@nrc.gov

Recipients:

"RulemakingComments Resource" <RulemakingComments.Resource@nrc.gov>

Tracking Status: None

"Rulemaking1CEM Resource" <Rulemaking1CEM.Resource@nrc.gov>

Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

| Files | Size | Date & Time |
|------------------|--------|-----------------------|
| MESSAGE | 254 | 12/16/2013 3:41:23 PM |
| 0869 clemons.pdf | 129615 | |

Options

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

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| As of: December 13, 2013 Received: December 11, 2013 Status: Pending_Post Tracking No. 1jx-898q-979c Comments Due: December 20, 2013 Submission Type: Web |
|--|

Docket: NRC-2012-0246

Consideration of Environmental Impacts on Temporary Storage of Spent Fuel After Cessation of Reactor Operation

Comment On: NRC-2012-0246-0456

Waste Confidence - Continued Storage of Spent Nuclear Fuel; Extension of Comment Period

Document: NRC-2012-0246-DRAFT-0869

Comment on FR Doc # 2013-26726

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General Comment

WRITTEN COMMENT TO NRC WASTE CONFIDENCE

Proposed Rule docket NRC-2012-0246

GEIS and Continued Storage of Spent Nuclear Fuel

12/12/2013

attached

Attachments

V.Clemons NRC Written Comment on Waste Confidence 12-12-2013

WRITTEN COMMENT TO NRC WASTE CONFIDENCE
Proposed Rule docket NRC-2012-0246
GEIS and Continued Storage of Spent Nuclear Fuel
12/12/2013

My name is Victoria Clemons and I am a citizen of the Great Lakes Community living on the shore of the Great Lake Erie. Please note that you cannot tell if I am a U.S. citizen or a Canadian citizen ... for that is my point. Thank you for the opportunity to speak at the Perrysburg, Ohio meeting on 12/2/2013. Because of the three-minute time constraint I appreciate your considering the more detailed explanation of my concerns in written form.

I am very appreciative of the opportunity to share my thoughts on the important topic of waste confidence and its relationship to the new "consent-based" siting approach for nuclear waste management facilities for interim storage and on a permanent geologic repository. The idea of local communities forming partnerships with implementers under the auspices of national governments appears to be gaining traction in countries opting for voluntary siting. Some version of this idea can be found in Sweden, the UK and Canada. The only catch here is that there must be a community that has the infrastructure, the real estate, a knowledgeable workforce, and educated citizens that understand both science and risk. I'm not sure that this community exists.

In the UK, as well as in Canada the nuclear waste leadership role was removed from scientists and engineers, and the leadership was temporarily placed in the hands of very prominent individuals who developed new, radically different, policy proposals that took social aspects seriously and used social science as their tool.

U.S. nuclear waste regulators and stakeholders currently are waiting on the sidelines as Canada inches closer to approval of their Deep Geological Repository in the next few months. The entrance to this radioactive repository would be less than one-half mile from Lake Huron and the possibility of radioactive contamination of Lake Huron and other waters downstream including Lake Erie, Lake Ontario and the St. Lawrence River are frightening. In Kincardine, Ontario approximately 8000 voters approved to host such a facility, you call it "voluntaristic siting" ... but ... the definition of "community" for this planned burial requires the engagement and acceptance of 40 million other people who live, work, play, eat and drink from the Great Lakes.

Consent-Based-Siting in this instance is ... a failure ... SITTING on an international body of FRESH water, the LARGEST in the world.

My hometown of Port Clinton, Ohio is the third Ohio city to pass a resolution opposing radioactive waste burial in the Great Lakes watershed. The Lake Erie Caucus of the House of Ohio State Representatives will also be writing a resolution, joining Michigan in opposing the Canadian Nuclear Waste Repository.

At this time I would also like to add that when discussing a permanent facility there are ... in fact ... TWO ... quite different aspects to consider for storage of nuclear waste in a Geological Repository. The first is providing a place where nuclear waste can be securely stored and monitored in a safe and retrievable fashion ... and the second aspect is abandoning those wastes, closing and sealing the underground facility that will, at some point be, forever after, unmonitored, unmanned, unregulated and eternally beyond human control.

Rolling Stewardship is a relatively new concept. It was first introduced in the 1995 by the National Research Council, the working arm of the United States National Academies, which produces reports that shape policies. The study, "Improving the Environment", called direct attention to the concept of "Rolling Stewardship" as an important option for addressing contaminated sites that pose significant cleanup challenges. "Rolling stewardship" means planning for stewardship one generation ahead; by doing it one generation at a time with continuity of knowledge and effort.

Rolling Stewardship of the radioactive mess we have made ... IS NOT AN OPTION ... IT IS A REQUIREMENT.

This requirement is best achieved with Hardened On-Site Storage. Hardened Onsite Storage has been endorsed by hundreds of environmental and public interest groups, representing all 50 states. Densely-packed, vulnerable HLRW storage pools, at risk of fire and radioactivity releases, should be emptied into on-site dry cask storage that is "hardened": that is, designed and built well, safeguarded against accidents, fortified against attacks, and protected against leakage into the environment.

The NRC must change its nuclear reactor licensing process to require an individual Environmental Impact Statement for each site determining the impact of creating and storing radioactive waste on each reactor site. The health and safety effects on communities and the environment in proximity to each site needs to be carefully considered in a site specific manner.

Thank you for this opportunity to voice my concern.

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