

Rulemaking1CEm Resource

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Subject: FW: Waste Confidence EIS Comments Docket # NRC-2012-0246

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TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel

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From: Terrence Clark [mailto:terryclarkpsych@gmail.com]
Sent: Sunday, December 15, 2013 11:22 AM
To: RulemakingComments Resource
Subject: Waste Confidence EIS Comments Docket # NRC-2012-0246

10 Chestnut Creek Rd

Candler, NC 28715

November 28, 2013

Secretary, US NRC

Washington DC 20555-0001

Attention: Rulemaking and /Adjudication Staff

Reference docket ID # NRC 301-415-1101

Waste Confidence Generic EIS

Dear Nuclear Regulatory Commission

Officials;

I request that you consider my following comments in your review and revisions of the draft Generic EIS on Waste Confidence.

1.) The time-frame of the Waste Confidence plan does not make good sense. The time-frame should start now. The environmental impact of stored nuclear waste on site or in interim sites must be considered from the start of when it is first stored. The applicability of the GEIS should not take effect as far in the future as 60 years from now.

2.) The draft GEIS is not consistent with the NRC mission statement. The mission statement of the NRC starts with “protection of human health”.

3.) Security and safety are closely intertwined and both need to be addressed in the GEIS. For example, the threat of sabotage of a commercial nuclear power site from terrorists, or others with ill intent, are real risks. The environmental impact of such sabotage needs to be considered in the GEIS. Various scenarios need to be considered such as explosion, flood, drought, fire.

I advise that the authors/NRC establish several principals that are maintained in the revision of the draft. These principles include:

1.) Ionizing radiation can cause cancer. The draft ruling and plan fails to appropriately emphasize that radiation is potentially harmful to humans. The GEIS should not rely on the United Nations UNSCEAR report for effects of radiation on humans. The UNSCEAR report only utilized the probable effect of radiation released in the first week of the Fukushima meltdown. The reality is that radiation continues to be released two and a half years later. Adverse health effects, especially malignancies are most

often delayed until years after exposure. We are already seeing increase of thyroid cancers especially in children.

2.) Structural/system issues can have an adverse effect on sound management of nuclear waste. This includes for example, officials securing employment in nuclear related industries following their work with The NRC. This risks placing personal gain over the mission of The NRC. Such structural/system must be addressed as potentially harmful to health and the environment.

3.) Lessons from Fukushima are too readily dismissed and minimized in the EIS. This adversely impacts the formulation of the EIS. Fukushima has caused massive environmental degradation, evacuation of a large area, and there is a high probability that it will increase the incidence of malignancies in humans. These lessons must influence the gravity and precautions we need to take in managing nuclear waste. One example of this is that by defining the timeframe of waste management starting once a reactor is decommissioned avoids addressing a Fukushima type incident. The EIS must address situations wherein a functioning reactor is in proximity to stored nuclear waste.

Note that the Fukushima Nuclear Accident Independent Investigation Commission determined that an overly close relationship between regulators and industry representatives contributed substantially to the poor management of the Fukushima outcome.

4.) Terrorism is a risk for environmental and adverse health effects. This is minimized and not thoroughly considered in the draft EIS.

5.) Security never is 100%

6.) There is no scientifically proven solution for safely disposing of nuclear waste.

7.) Utilize the best science as a basis for decisions. For example, incorporate the best scientific information regarding predicted climate and sea level changes and their impact on the safe management of nuclear waste storage.

8.) Decisions regarding nuclear waste management have a long-term impact. Such decisions impact generations to come. The time frame that nuclear waste can impact the environment and human health was referred to by Judge Sentelle in a court document as “for time spans seemingly beyond human comprehension”.

The GEIS needs to consider such long term impact in the decisions pertaining to waste management.

9.) The GEIS needs to add more consideration of the environmental impact of water on waste management. A persistent source of water is needed for cooling spent fuel rods. Please address the impact of droughts and floods on nuclear waste management.

The catastrophe in Fukushima demonstrated the continual need for huge amounts of water needed for cooling year after year. The GEIS needs to address the environmental and health risks of floods, earthquakes tsunamis and droughts.

I urge that you revise the GEIS keeping these principles in mind.

We do not have a scientifically proven solution for safely disposing of nuclear waste. There is no good reason to continue to rely on nuclear power. Clean, renewable sources of electricity are readily available and affordable

The soundest solution to management of nuclear waste is: STOP Making Nuclear Waste.

Thank you.

Sincerely

Terrence P. Clark, MD

Chairperson,

Western North Carolina Chapter,

Physicians for Social Responsibility

References: 1.) Factsheet from Physicians for Social Responsibility titled,
“Fukushima Disaster: Impacts and Continuing Threats”

2.) IPPNW Review of Fukushima

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