

## WCRM-GEIS4CEm Resource

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**From:** Monica and Hugo Steensma [monica@vom.com]  
**Sent:** Saturday, November 23, 2013 8:12 PM  
**To:** RulemakingComments Resource  
**Subject:** Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

My husband & I, & our families wish, in the first place, to express our EXTREMELY STRONG OPPOSITION to the continued use of nuclear power, & other highly dangerous applications of nuclear technology outside the medical field, such as weapons!

Such uses of nuclear technology are inordinately risky, & in the case of weapons, patently immoral, and, the notion that there can be long-term safe storage for the deadly waste thus generated is a complete fiction. There is no way to create such storage for lethal materials in most cases, a half-life of thousands, & tens of thousands of years!

The NRC's deeply flawed "waste confidence" principle was properly struck down by a federal court because, some 60 years into the commercial atomic age, it is painfully obvious that there is not now, nor will there ever be a 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 ENTIRELY inadequate from a public safety standpoint, and do not offer the requisite confidence to allow the 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.

The idea of "low probability" is not a substitute for protection, since, as the world already has learned from Fukushima to Chernobyl to Bhopal and Love Canal, highly toxic & indeed, deadly, materials such as nuclear wastes cannot be safely managed.

In view of the intractability of the nearly eternal problem of how to safely handle & store substances as lethal as nuclear wastes, the single most important step we can take to

minimize & eventually eliminate additional ongoing risks surrounding storage of such materials is to put a prompt and permanent end to their production & use!

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.

Monica and Hugo Steensma

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