

WCRM-GEIS4CEm Resource

From: Margo Krindel [sanf_sara@yahoo.com]
Sent: Friday, November 22, 2013 6:29 PM
To: RulemakingComments Resource
Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

In all of the decades we've been using atomic energy, there is no long-term storage method for nuclear waste which is based on sound science, offers robust protection for the environment, and is supported by the citizens who would be affected. That's why a federal court rightly rejected the NRC's 'waste confidence' principle.

Even the short-term solutions pose grave dangers, and this is why we should reduce the radioactive waste being generated to as low as level as possible.

The NRC's Draft NUREG-2157 does not do a single thing to change this situation.

This document was obviously put together in a hurry, and rather than being based on thoughtful consideration of the NRC's radioactive waste policies, it is simply an attempt to restart licensing and re-licensing of nuclear power plants as soon as possible.

The NRC makes the absurd argument that 'indefinite' –i.e. permanent–storage of high-level radioactive waste in fuel pools and dry casks which were never designed for permanent storage provides “confidence” that this waste will never cause a threat to public health and safety.

The NRC's plan does not account for the many foreseeable disasters, such as earthquakes, hostile attacks, hurricanes, etc. Instead, it claims that it's safe because of the low probability of events. However, given that these materials will be dangerous for up to a thousand years, and the amount of waste which needs to be stored, it's clear that over time there is a high probability that a 'low probability' disaster will happen.

Both Fukushima and Chernobyl were 'low-probability' events.

The best thing we can do to protect the public is to stop the generation of new radioactive waste as soon as possible, and the NRC should revise its Waste “Confidence” document to ensure the speediest possible end to that generation. Additionally, the 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.

Margo Krindel

CA

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