

WCRM-GEIS4CEm Resource

From: Beth Jones, expat from Iowa [blj1@direkt.at]
Sent: Thursday, November 21, 2013 4:47 AM
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 very rightly struck down by a federal court because, some 60 years into the commercial atomic age, it is patently obvious that there is no foreseeable, adequately safe "solution" for long-term radioactive waste storage that would attain three necessary and basic goals: that that storage is scientifically defensible, environmentally responsible AND publicly acceptable.

Back to the drawing board -- and this time don't come back to the People until you've seen the wisdom of NOT relicensing nuclear power plants at ALL. For only INOPERABLE nuclear power plants produce more and more unwanted radioactive waste.

Informed (and thus outraged) citizens know that not only do you have no long-term solution for atomic waste, the shorter-term programs now in place are woefully inadequate in terms of public safety, and they in no way offer the requisite confidence to allow continued generation of radioactive waste.

Nothing in the NRC's Draft NUREG-2157 changes these dire realities. So what must change is the NRC's attitude. From Fukushima to Chernobyl to Bhopal to the BP spill, the world has learned a lot about catastrophic "low probability" disasters in recent years. Apparently the NRC was temporarily off-planet during those and many other events, and so SOMEhow, strangely didn't hear about their horrific aftermaths. The NRC also seems to have failed to notice 9/11, Mumbai, and all of the other unfortunate real-life indications that certain people exist who actually want to cause widespread nuclear disasters.

The NRC clearly cares more about its ability to license and re-license nuclear reactors than it does about protecting the public from the radioactive poisons that would be released from a radioactive waste accident. And this in the era of solar and wind -- TRULY clean sources of energy, which in other countries are quickly approaching parity with traditional fossil fuel sources.

It is also apparent that, instead of undertaking a thoughtful re-examination of the NRC's radioactive waste policies and priorities -- which admittedly might have taken considerable time and effort, but we ARE talking about national security and public health here! -- no, the NRC chose to hurriedly slap together a document whose only purpose is to provide a specious "cover" for overturning the agency's forced moratorium on reactor licensing and renewal procedures.

It's high time the NRC gets with the public's program. Your "the dog ate my homework"-level attempts to stall for more time & profit are despicable and unacceptable.

The NRC is the only regulatory body in the world that is arguing that indefinite -- i.e. 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.

Just how STUPID do you think We the People are? Neither casks nor fuel pools are designed for permanent storage -- WE know that. So don't pretend YOU don't.

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.

Low probability is no substitute for protection, as the world already has learned from Fukushima to Chernobyl to Bhopal and Love Canal.

Ending radioactive waste generation is the single most important step we can take to minimize the risks surrounding its storage, and the NRC should revise its Waste "Confidence" document IMMEDIATELY AND THOROUGHLY to ensure the speediest possible END to that generation, in its entirety.

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.

Informed and thus outraged citizens demand and deserve nothing less than the BEST your agency can do. So quit stalling and DO your JOB!

Beth Jones, expat from Iowa

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