

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Tuesday, December 17, 2013 11:40 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

**DOCKETED BY USNRC—OFFICE OF THE SECRETARY  
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**NRC DOCKET#:** NRC-2012-0246  
**SECY DOCKET DATE:** 11/21/13  
**TITLE:** Waste Confidence—Continued Storage of Spent Nuclear Fuel  
**COMMENT#:** 00425

-----Original Message-----

From: Grace Adams [<mailto:graceadams830@gmail.com>]  
Sent: Thursday, November 21, 2013 1:46 PM  
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 properly struck down by a federal court because, some 60 years into the commercial atomic age, it is patently obvious that there is no 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 inadequate from a public safety standpoint, and do not offer the requisite confidence to allow continued generation of radioactive waste.

Spent fuel rods take about 3,000 years to cool down to the same amount of radioactivity as in all the ore it took to make the fuel rods. 3,000 years is as long as from the reign of King David of ancient Israel to now and longer than any sovereign nation has lasted as a sovereign nation so far. US Navy has re-manufactured spent fuel rods to make new fuel rods meeting same specs as original equipment fuel rods, spent uranium which has cooled enough that it can be used as the counter weight in a fork life truck with suitable lead shielding to protect the operator and is probably about as radioactive as some of the more radio-active types of granite, and short-lived radio-active isotopes (average half-life about 30 years) that will take about 1100 to 1200 years to cool down to the same amount of radioactivity as virgin uranium ore, compared to the 3,000 years it would take for not reprocessed spent fuel rods to reach that state. I know you are ferociously jealous of US Navy. However, it would suit the owners of the reactors with expired licenses, the public, and US Navy just fine if you could turn over those expired license reactors and the spent fuel rods to US Navy and buy back the fuel rods meeting original equipment specs made from the material in spent fuel rods from US Navy to avoid the need to buy fuel rods made from virgin uranium ore. I have a LOT MORE CONFIDENCE in US Navy with its great track record on nuclear power plant safety than I do in either any for profit corporation or any civilian regulatory

agency that has been regulating its same industry for more than ten years. So, please turn over reactors with expired licenses and spent fuel rods to US Navy to deal with as it sees fit.

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.

Low probability is not a 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 to ensure the speediest possible end to that generation.

Letting US Navy reprocess spent fuel rods to make new rods from material in old rods will help some. 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.

Grace Adams

CT

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