Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Tuesday, December 17, 2013 12:04 PM
To: Rulemaking1CEm Resource
Subject: FW: (Docket ID: NRC-2012-0246) Generic EIS
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NRC DOCKET#: NRC-2012-0246
SECY DOCKET DATE: 12/17/13
TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel
COMMENT#: 00440

From: Josan Feathers [mailto:josan.dem@cox.net]
Sent: Tuesday, December 17, 2013 1:19 AM
To: RulemakingComments Resource
Subject: (Docket ID: NRC-2012-0246) Generic EIS

Nuclear Regulatory Commission (NRC)

(Docket ID: NRC-2012-0246) Generic EIS

Dear Commissioners,

December 16, 2013

After attending the NRC staff presentation and reviewing their literature at the Carlsbad, California hearing on November 18, 2013, I am compelled to submit additional comments.

As a Registered Civil Engineer, I am baffled by your decision to even consider submitting a ***Generic*** Environmental Impact Statement (EIS). Proposing the same safeguards for stockpiled nuclear waste at ***all*** of the nuclear facilities throughout the country is irresponsible and unsafe! Establishing identical safety requirements for an isolated facility in a sparsely populated area in New Mexico, for instance, and the San Onofre facility, located within ***fifty*** miles of over 8.5 million people, next to known off-shore earthquake faults capable of 8.0 magnitude earthquakes and situated on eroding bluffs in a potential tsunami zone is reckless. The only evacuation route is Interstate 5, situated adjacent to the plant. It is even more frightening considering that the San Onofre nuclear facility is adjacent to Camp Pendleton, one of the largest military installations on the West Coast, a potential target for terrorists. This is madness!

Furthermore, your approval of high burnup fuel at San Onofre requires that this waste be stored on-site in crowded spent fuel pools for a ***minimum*** of twenty years instead of in safer concrete and steel dry casks. The dry casks are not vulnerable to the loss of coolant if electricity if disrupted by an earthquake or other natural disaster since they are passively cooled by natural air flow. Spent fuel pools at nuclear power plants are intended to house nuclear waste ***only*** until it is cool enough to be transferred to permanent storage. In the U.S.,

overcrowded cooling pools can contain up to ***forty*** times more nuclear material than the reactor cores. Additionally, these pools lack equivalent containment buildings and safety systems for protection.

Independent experts at the Union of Concerned Scientists and elsewhere agree that the dangerous, radioactive waste from spent fuel pools, that has cooled sufficiently, should be ***required*** to be transferred to safer, on-site dry cask storage. Dry casks are economically viable and provide a storage alternative for twenty years for high burn up fuel or until an off-site storage facility becomes available, if ever.

At a minimum, the NRC should ***not*** approve higher densities of fuel assemblies in dry cask systems and should ***stop*** approving the use of high burn up fuel in existing plants. Better yet, the remainder of operating U.S. nuclear power plants should be shut down until a reasonable and ***safe*** procedure to deal with the deadly radioactive waste is developed.

In your generic EIS, the impacts are classified as mostly small – that is, until an accident like Fukushima occurs. This EIS does ***not*** adequately address, much less, solve the problem. I have ***NO*** confidence in your approach or this EIS. Thank you. Sincerely,

Jösan Feathers, Registered Civil Engineer
4025 Corte Tierra Alta
La Mesa, CA 91941

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