

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Tuesday, December 17, 2013 12:05 PM
To: Rulemaking1CEm Resource
Subject: FW: Comment on DGEIS

**DOCKETED BY USNRC—OFFICE OF THE SECRETARY
SECY-067**

PR#: PR-51
FRN#: 78FR56775
NRC DOCKET#: NRC-2012-0246
SECY DOCKET DATE: 12/17/13
TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel
COMMENT#: 00441

From: joe waldstein [mailto:jwaldstein@yahoo.com]
Sent: Tuesday, December 17, 2013 8:38 AM
To: RulemakingComments Resource
Subject: Comment on DGEIS

To: Rulemakings and Adjudications Staff

Re: Docket ID NRC-2012-0246
Waste Confidence Generic EIS

The proposed new Rule on Waste Confidence is deficient in the following three fundamental respects:

1. It does not require a site specific Waste Storage Plan for each existing or proposed nuclear power generating station.
2. It does not require the transfer of Spent Fuel from storage pools into hardened on site dry cask storage as soon as the fuel becomes cool enough to make the transition.
3. It does not require the establishment of a permanent National Waste Storage Repository before new or extended licenses are granted.

The operating assumption behind the new proposed rule is that Waste Storage at individual sites is intrinsically safe for as long as necessary (multiple generations) regardless of the environmental conditions and population density surrounding each plant. This seems to be an arbitrary assumption, conveniently concocted to deny risk and save money. The focus of any rule which speaks confidently to a given population should be the safety of the community. Consequently, the first issue to be addressed should be the reduction in the density of overcrowded spent fuel pools. These are accidents waiting to happen, given how many are now filled to far beyond their original intended capacity. There is no reason to accept this kind of unnecessary risk unless, of course, the focus is on limiting expenses for Station operators.

The pools were never meant for long term storage but, given that many old plants have renewed licenses which extend their operation up to 60 years, this has become the norm.

Of course, transfer to dry cask storage is not without it's own long term risk. There is no doubt that for short term storage, dry casks are more reliable than Spent Fuel Pools.

The events at Fukushima after the March 2011 earthquake & tsunami proved this point since there was no damage to the dry casks present at the site at the time of the multiple accidents.

The dangerous condition of the pool at unit #4 speaks volumes about the risk which overcrowding presents.

However, Dry Cask Storage is not a long term or permanent solution by any means.

The original licenses for the nation's reactors did not envision long term storage of nuclear waste on site as a responsible or necessary option.

That said, the NRC is now asserting that storage indefinitely in dry casks will be safe & reliable for generations so long as the casks are replaced every 100 years by those who follow.

This is another unreasonable assumption since human beings are notoriously fickle & irrational.

Since our collective will to avert disaster is weak, (note the incomprehensible collective failure to address climate change in a meaningful manner) probabilities abound for disasters untold, which neither we nor our immediate descendents will be able to imagine.

Consequently, even if all of the nuclear waste which has accumulated until now is placed in hardened dry cask storage as soon as possible, there still will remain the problem of locating and building a permanent National Storage Site.

And even if this becomes a possibility in the near future, safe movement of the massive quantity of waste fuel already generated will still remain an extremely risky operation.

In any event, without the establishment of a permanent National Storage site, the NRC will be pursuing an irrational and dangerous policy if it persists in granting new licenses or extending old ones in an environment where an increase in the total quantity of Nuclear Waste Fuel only compounds an already intractable problem.

This type of irrationality only lends strength to the argument that we cannot confidently predict that future generations will act responsibly when handling the dangerous waste we're leaving in their hands.

It is irrational for the NRC not to mandate immediate removal of as much spent fuel as possible from the overcrowded pools at our nation's Nuclear Reactors.

As previously stated this is largely a matter of money. Safety is a secondary consideration.

The interests of the NRC and the operators of Nuclear Reactors are not the same as the Public's interest.

Protecting the Public from the health consequences of radiological releases should be the abiding and primary function of the NRC.

Sadly, it seems that protecting the Nuclear Operators from the necessity of spending the necessary funds to insure public safety is instead the primary function of the NRC.

Sincerely yours,

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Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 463

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D0014433AE40AB)

Subject: FW: Comment on DGEIS
Sent Date: 12/17/2013 12:04:39 PM
Received Date: 12/17/2013 12:04:39 PM
From: RulemakingComments Resource

Created By: RulemakingComments.Resource@nrc.gov

Recipients:
"Rulemaking1CEM Resource" <Rulemaking1CEM.Resource@nrc.gov>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	5236	12/17/2013 12:04:39 PM

Options
Priority: Standard
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Expiration Date:
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