

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Wednesday, December 18, 2013 3:36 PM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: Response to NRC Docket ID No. NRC-2012-0246

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**SECY DOCKET DATE:** 12/18/13

**TITLE:** Waste Confidence—Continued Storage of Spent Nuclear Fuel

**COMMENT#:** 00478

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**From:** Richard Grigg [<mailto:rgrigg@cox.net>]  
**Sent:** Wednesday, December 18, 2013 2:33 AM  
**To:** RulemakingComments Resource  
**Subject:** Response to NRC Docket ID No. NRC-2012-0246

12/17/13

Comments on the DRAFT - USNRC Waste Confidence Generic Environmental Impact Statement

Most people who live within a 50 mile radius of SONGS want the spent fuel stored there removed to assure safety in the case of a large Earthquake and the possible resulting Tsunami - while the odds of such events occurring are low they are possible.

The reality appears to be that there is no place to move the spent fuel at this time, it also appears that dry cask storage while having problems of its own would at least lower the risk of massive radiation danger of a widespread dispersal of contaminating particles should an earthquake damage the holding pool and cause loss of the cooling water with a resulting fire.

With this in mind the most rational approach is a concentrated effort to move any and all spent fuel that has aged enough to be stored in dry casks into dry storage immediately - this would greatly lessen the problems that would need to be managed if a large Earthquake were to occur.

On reviewing the Draft of "Waste Confidence Generic Environmental Impact Statement" the NRC states (Draft NUREG-2157 - page xxx dated September 2013) :

"The NRC's concept of risk combines the probability of an accident with the consequences of that accident.

In other words, the NRC examines the following questions:

- . What can Go Wrong?
- . How likely is it?
- . What would be the consequences?"

They conclude that the risk for Short Term, Long Term and Indefinite Storage the risk of problems or of injury is SMALL

see Draft NUREG-2157 Pages xlv, xlv dated September 2013.

I believe this position is very close to the position the Japanese Regulators took prior to the disaster at Fukushima.

The problem that is not addressed in the NRC approach is that the extremely large amount of damage and the extreme cost of the sort of disaster that a loss of spent fuel cooling water could cause by contaminating a large area is staggering (it is estimated that the existing spent fuel at SONGS contains 50 times the Cesium 137 that was released during the 1986 Chernoble disaster which resulted in the initial evacuation of 350,000 people and at this time the land and homes in a 19 mile radius have been forcibly abandoned with entry limited to Monitoring and Research Personnel who stay only a short time)

Most will agree with the NRC that the chances of a monster earthquake which causes a widespread disaster may in fact be quite low, however, the potential extent of damage is so great that it over rides the conclusion that the risk is small because the chance of such an event occurring is small - reason demands that every step possible be taken to eliminate the chance of such a disaster be taken immediately - that first immediate step should be to move any spent fuel that has aged enough to Dry Cask Storage as quickly as possible.

Finally, the NRC states the chances of a successful Terrorist Attack are low and the risk is small, however, a study done by the National Academy Of Science after 9/11 that has been de-classified suggests that spent fuel should be stored dry at a non reactor site specifically because of the possibility of Terrorist Attack.

At first review, the NRC' s position that a successful terrorist attack is unlikely and unthinkable and creates small risk. Unfortunately, the whole 9/11 attack was unlikely and unthinkable also - it succeeded partly for that reason but also because the attackers were willing to spend an exceptional amount of resources and time to get it done and they did not have a problem with suicide or killing in general - these factors have not been properly factored into the NRC evaluation of the Terrorism issue

In Conclusion, any NRC policy on Reactor Waste management needs to better address the problems listed above - the present proposal is not acceptable.

Sincerely,

Richard L. Grigg

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