

WCRM-GEIS4CEm Resource

From: Michael Strawn [mjs55@juno.com]
Sent: Friday, November 22, 2013 1:58 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 since it was predicated on the assumption that a permanent repository for high-level radioactive waste would be operational relatively soon.

That was clearly not the case and it still is not true today.

The court also found that the NRC had no technical basis to simply assume that temporary storage methods (fuel pools and dry casks) are adequate for indefinite -- potentially permanent -- storage of this lethal material.

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.

Nothing in the NRC's Draft NUREG-2157 changes these realities. It is apparent that NRC has failed to undertake a thoughtful re-examination of the its radioactive waste policies and priorities.

This document's 585 pages boil down to this: Rather than providing a sound technical basis for a robust radioactive waste system, it asserts that no matter how high-level nuclear waste is stored -- in fuel pools, in dry casks, at some centralized interim site -- it will be safe.

Why? Because NRC assumes the probability of an accident to be low.

Yet from Fukushima to Chernobyl to Bhopal to the BP oil spill, the world has learned a lot about catastrophic "low probability" disasters in recent years. Was the NRC was asleep during those and many other events?

NRC also seems to have missed 9/11, Mumbai, and all of the other unfortunate real-life indications that there are some people who intentionally want to cause widespread catastrophe.

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 were 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 supposedly low probability of an accident to justify its position that reactor licensing and relicensing can 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. In the interim, NRC should 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.

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