

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
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**To:** Rulemaking1CEm Resource  
**Subject:** FW: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

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

From: Doug Bogen [<mailto:dbogen@metrocast.net>]  
Sent: Friday, December 20, 2013 2:18 PM  
To: RulemakingComments Resource  
Subject: Comment on Draft NUREG-2157 -- Docket NRC 210-0246 Waste Confidence Generic Environmental Impact Statement

Dear Secretary,

On behalf of the Seacoast Anti-pollution League (SAPL) and its 200 members living within 20 miles of the Seabrook nuclear plant and its waste storage sites, I would like to submit the following comments on your draft Waste Confidence GEIS.

When our organization was formed over 44 years ago, in response to plans to construct a nuclear plant on the NH Seacoast, we were told confidently that the nuclear industry could handle this waste and that the government would come up with a permanent solution to isolate it for tens of thousands of years. 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 is scientifically defensible, environmentally responsible and publicly acceptable.

Not only is there no long-term solution for nuclear 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 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 court-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 equal “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. The catastrophic events two years ago and ongoing in Fukushima, Japan should make it obvious to even the casual observer that storage in fuel pools in particular is significantly more dangerous, especially when most of those wastes can be safely put in dry casks.

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 Three Mile Island.

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 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.

The approximately 600 tons of highly radioactive spent fuel generated at our local nuclear plant, most of which is still underwater, is expected to end up in casks behind a simple chain-link fence in a former parking lot, across from the plant's visitors center and no more than 100 yards from the shoreline. With sea level rising and our coastline being increasingly eroded away, this existing arrangement appears woefully inadequate to secure these deadly wastes many decades into the future. Your GEIS and rulemaking should at the very least acknowledge and address these sort of shortcomings in existing waste management.

Millions of people in this country living within close proximity to these radioactive wastes are depending on you to ensure that they are 100 percent safely and securely stored for the indefinite future. That is certainly a daunting task, but it is made all the more uncertain by the false and poorly defended assurances contained in your draft GEIS.

Doug Bogen

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