

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Thursday, December 26, 2013 9:27 AM
To: Rulemaking1CEm Resource
Subject: FW: Docket ID No. NRC-2012-0246 -- Comments by NWSC
Attachments: NWSC Comments to NRC on WC Final 122013.pdf

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TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel
COMMENT#: 00672

From: Katrina McMurrian [<mailto:katrina@thenwsc.org>]
Sent: Friday, December 20, 2013 3:28 PM
To: RulemakingComments Resource
Subject: Docket ID No. NRC-2012-0246 -- Comments by NWSC

RE: Docket ID No. NRC–2012–0246

Please see the attached comments from the Nuclear Waste Strategy Coalition (NWSC), signed by our Chairman & Minnesota Public Utilities Commissioner David Boyd, regarding the Waste Confidence draft generic environmental impact statement (DGEIS) and proposed rule.

Thank you for your consideration of our input. If there are any questions, please contact me at the number below.

Best regards,

Katrina

Katrina J. McMurrian
Executive Director
Nuclear Waste Strategy Coalition (NWSC)
337.656.8518 office
888.526.6883 fax
katrina@theNWSC.org
www.theNWSC.org
www.Twitter.com/NWSCoalition

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David C. Boyd, Chairman
Commissioner, Minnesota Public Utilities Commission

Renze Hoeksema, Vice Chairman
Director of State Affairs, DTE Energy

Greg R. White, Membership
Commissioner, Michigan Public Service Commission

Robert Capstick, Finance
Director of Government Affairs, Yankee Atomic

Lauren "Bubba" McDonald, Jr., Communications
Commissioner, Georgia Public Service Commission

David A. Wright, Ex-Officio
President, Wright Directions



December 20, 2013

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

RE: Docket ID No. NRC-2012-0246

The Nuclear Waste Strategy Coalition (NWSC) is an ad hoc organization representing the collective interests of member state utility regulators, consumer advocates, tribal governments, local governments, electric utilities, and other public and private stakeholders on nuclear waste policy matters. Our primary focus is to protect electric consumer payments into the Nuclear Waste Fund and to support the removal and ultimate disposal of used nuclear fuel and high-level radioactive waste currently stranded at numerous sites across the country. Therefore, our members follow the issue of waste confidence closely, and we are grateful for this and numerous other opportunities provided by the Nuclear Regulatory Commission (NRC) for stakeholder input before making a final decision.

Specifically, we compliment the NRC Waste Confidence Directorate's outreach efforts. Not only have they planned and successfully conducted 13 public meetings across the country, they have presented information on numerous status calls and at various stakeholder events to provide significant opportunities for all those interested to stay fully apprised of relevant waste confidence activities.

In addition, the NWSC recognizes the Directorate's ability to adhere to the schedule laid out by the Commission. We underscore the importance of maintaining the schedule so that NRC licensing decisions will not be unduly delayed.

We appreciate the NRC's efforts to develop bounding generic environmental analyses that address the issues raised by the D.C. Circuit Court's 2012 decision. However, we are concerned that all of the scenarios evaluated in your draft Generic Environmental Impact Statement (GEIS) involve protracted used fuel storage at reactor sites or away-from-reactor sites. One scenario even assumes indefinite at- or away-from-reactor storage accompanied by periodic (every hundred years) on-site transfer of used fuel to new dry storage canisters. Without question, indefinite storage is the wrong policy. While it is perhaps necessary to assess such a scenario in order to bound potential environmental impacts, we must point out that the scenario is entirely at odds with both the letter and spirit of the Nuclear Waste Policy Act (NWPA) and absolutely not an acceptable outcome for the citizens of the United States.

The federal government devotes inordinate amounts of time, money and energy to fighting (and eventually paying) legitimate damage claims by utilities, shutting down ongoing licensing reviews (i.e., Yucca Mountain), and addressing regulatory issues like Waste Confidence. Such efforts would be completely unnecessary if the federal government would simply do its job with respect to used fuel management, as called for by the law. We encourage the NRC to

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request the necessary funds from Congress to facilitate timely completion of the Yucca Mountain license review. Strong, bipartisan support remains for carrying out the provisions of the NWPA as passed by Congress decades ago, and your input about NRC funding needs would be valued and helpful in making more timely progress. Such actions will go a long way toward giving our members, other stakeholders, and the public the assurance that the federal government will make good on its obligation.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "David C. Boyd". The signature is written in a cursive, slightly slanted style.

David C. Boyd
Chairman, Nuclear Waste Strategy Coalition
Commissioner, Minnesota Public Utilities Commission