

Rulemaking1CEm Resource

From: RulemakingComments Resource
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To: Rulemaking1CEm Resource
Subject: FW: Docket ID No. NRC-2012-0246
Attachments: Georgia WAND waste confidence comments.pdf

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TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel

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From: courtney@georgiawand.org [<mailto:courtney@georgiawand.org>]

Sent: Friday, December 20, 2013 4:44 PM

To: RulemakingComments Resource

Subject: Docket ID No. NRC-2012-0246

Please find attached comments from Georgia Women's Action for New Directions RE: Docket ID No. NRC-2012-0246 Draft Generic Environmental Impact Statement and Proposed Waste Confidence Rule.

Thank you,
-Courtney

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**GEORGIA
WAND**

Women's Action for New Directions

WOMEN
POWER
PEACE

December 20, 2013

TO: US Nuclear Regulatory Commission

FROM: Georgia Women's Action for New Directions

RE: Docket ID No. NRC-2012-0246 Draft Generic Environmental Impact Statement and Proposed Waste Confidence Rule

Georgia Women's Action for New Directions is a women-led organization that works to reduce militarism and violence and redirect excessive military spending toward unmet human and environmental needs. We work closely with communities in South Carolina and Georgia who live near both nuclear power sites and nuclear weapons sites cleaning up how level nuclear waste.

We appreciate the opportunity to comment on the Draft Generic Environmental Impact Statement and the posed Waste Confidence Rule. Our members from across Georgia also participated in the public hearing in Charlotte.

A problem with no solution.

The United State's current stockpile of nuclear waste, about 80,000 tons, will remain toxic for thousands of years and scientists have not found a storage facility that will be able to house the amount of waste we have let alone for the amount of time it will need to be safeguarded from the risks of both natural disasters and outside attacks.

The only solution to the problem of nuclear waste is to stop making more. The Waste Confidence rule doesn't move national policy toward that solution, quite the opposite, it strives to find a waste policy that will allow the NRC to license new reactors and create more of the same problem.

Putting communities at risk.

Consolidated storage of nuclear fuel, which the Blue Ribbon Commission on America's Nuclear Future has officially recommended, would mean taking nuclear waste from the country's reactor sites to a temporary storage facility and then moving it again, decades later, to a more permanent facility.

Consolidated storage is creating a bigger problem, rather than moving toward a solution. Transporting waste away from nuclear reactor sites to a temporary facility would put dangerous

waste on our roads, rails and waterways and expose more communities to radioactive waste. Meanwhile, the companies producing the waste would be off the hook for managing it and the new temporary storage sites would require additional funds for security measures. High level nuclear waste should only be moved once and it should be kept as near as possible to the site that produced it.

NRC's Waste Confidence policy assumes that all nuclear waste is the same, but new forms of waste, such as Mixed Oxide Plutonium fuel, slated to be produced as the Savannah River Site in South Carolina are more radioactive and dangerous as well as more difficult to transport and store.

NRC downplays the risks of pool fires by assuming that surrounding populations will be successfully evacuated. But nuclear utilities are allowed to store high level radioactive waste in pools for many decades after reactors permanently shutdown, in order to defer the costs of dry cask storage as far off into the future as possible, despite the inherent risks. At the same time, NRC allows utilities, via exemptions from regulations, to do away with 10-mile radius emergency planning zones as soon as 12-18 months post-reactor shutdown despite the lingering risk of storing HLRW in pools at such shutdown reactor sites. How can populations be evacuated if EPZs have been dismantled?

Hindering Public Input

The proposed Waste Confidence Rule would effectively exclude public comments on nuclear waste production as part of future reactor licensing procedures. Because the rule would incorporate the draft GEIS's assumption that nuclear waste can and will be safely stored indefinitely, discussion about waste storage would not be up for public discourse.

Conclusion

The draft Environmental Impact Statement is inconsistent with the Nuclear Waste Policy Act and does not adequately protect human life or the environment. It should be withdrawn. The proposed Waste Confidence rule does not move national policy toward a sustainable solution to nuclear waste management. Instead it strives to find a waste policy that will allow the NRC to license new reactors without public input regarding spent fuel storage. The proposed rule should be withdrawn.