

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Thursday, December 26, 2013 10:44 AM
To: Rulemaking1CEm Resource
Subject: FW: Waste Confidence Rule Comments
Attachments: JMC_NRCWasteConfidenceComments_122013.pdf

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SECY DOCKET DATE: 12/20/13
TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel
COMMENT#: 00694

From: Shahla Werner [<mailto:shahla.werner@sierraclub.org>]
Sent: Friday, December 20, 2013 7:32 PM
To: RulemakingComments Resource
Cc: Susan Michetti
Subject: Waste Confidence Rule Comments

Dear NRC staff:

Please accept our attached comments on the draft waste confidence generic EIS, and contact us with any related questions or concerns.

Thanks for your consideration.

Happy Holidays,

Shahla Werner

Shahla M. Werner, Ph.D., Chapter Director
Sierra Club- John Muir Chapter
222 South Hamilton Street, Suite 11
Madison, WI 53703-3201
shahla.werner@sierraclub.org
Phone: (608) 256-0565
Fax: (608) 256-4JMC
<http://wisconsin.sierraclub.org/>

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John Muir Chapter

Sierra Club - John Muir Chapter
222 South Hamilton Street, Suite 1, Madison, Wisconsin 53703-3201
Telephone: (608) 256-0565 Fax: (608) 256-4562
john.muir.chapter@sierraclub.org http://wisconsin.sierraclub.org

December 20, 2013

Nuclear Regulatory Commission

RE: Waste Confidence Comments

Docket # NRC-2012-0246

Submitted electronically to: Rulemaking.Comments@nrc.gov

To Whom It May Concern:

The Sierra Club – John Muir Chapter is comprised of 15,000 members and supporters of the nation's oldest, grassroots environmental organization working to reduce climate change threats and protect water and land resources in Wisconsin. We are writing to express our concerns about the generic waste confidence environmental impact statement for radioactive nuclear waste.

In 1984 the Nuclear Regulatory Commission (NRC) issued its first 'waste confidence' decision, which claimed that permanent nuclear waste storage was technically feasible. This enabled the NRC to license and renew aging nuclear reactors without considering public concerns about the effects of extended waste storage for each individual site, given their "confidence" that a permanent repository would be found. In Wisconsin, the NRC renewed the operating license for the Kewaunee Power Station 2011, which would have extended the station's operation an additional 20 years until 2033, had it not ceased operations earlier in 2013 due to economic issues. The NRC renewed the operating license for our remaining nuclear reactors, Point Beach Unit 1, with a capacity of 512 MW, operating since 1970, until 2030; and Point Beach Unit 2, with a capacity of 514 MW, operating since 1973, until 2033.

After Yucca Mountain failed to be suitable as a permanent, safe repository for nuclear waste, the US District Court of Appeals threw out the NRC's Confidence Decision on June 8, 2012. The NRC must now admit that no safe, permanent repository exists, and that 70,000 tons of accumulated nuclear waste may be permanently stored at reactor sites. The NRC must now thoroughly review Environmental Impacts of onsite storage, and consider safer alternatives to nuclear when licensing decisions come up.

Given that the court has verified that no permanent, safe storage solution is likely to be found, the Sierra Club – John Muir Chapter urges the NRC to consider the following points in the final Waste Confidence Environmental Impact Statement:

- **Stop licensing new nuclear reactors, and stop relicensing aging reactors as the first alternative:** This will at least provide some assurance to citizens that the problem of storing vast amounts of dangerous nuclear waste, often on the shores of fragile water bodies, including our Great Lakes, won't continue to grow. Creating additional waste without an identifiable solution

for its permanent, safe storage is not rational or responsible to future generations.

- **Employ the safest possible onsite alternatives for existing nuclear waste**, such as Hardened On-Site Storage (HOSS) to reduce risk of leakage or terrorist attack. The NRC should take immediate action to reduce the fuel assemblies in spent fuel pools, as well as analyzing the deficiencies of current dry cask storage.
- **Oppose any proposal to transport and stockpile nuclear waste at interim sites throughout the country.** This proposal is risky and unnecessary and it therefore should not be seriously considered.
- **Questions of environmental justice must be considered in the EIS.** Low-income communities dominated by American Indians and people of color have historically been disproportionately impacted by nuclear energy production, from mining to radioactive waste dumping.
- **The life cycle costs of nuclear power should be assessed in detail in the EIS**, including the substantial front end subsidies, uranium mining and enrichment impacts, and the long term, substantial costs of safely, properly decommissioning and managing nuclear waste.
- **The unpredictable effects of global warming - from increased droughts to flooding to rising temperatures to fluctuating water levels - must be considered** in all future licensing and waste storage decisions.

Thanks for your consideration. We look forward to hearing from you soon.

Sincerely,

A handwritten signature in cursive script that reads "Shahla M. Werner". The signature is written in black ink on a white background.

Shahla Werner, PhD, Director
Sierra Club – John Muir Chapter