

Rulemaking1CEm Resource

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From: David Kraft [<mailto:neis@neis.org>]
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Testimony presented to the National Regulatory Commission

Docket ID NRC-2012-0246

November 14th in Rockville, MD

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I am here representing the Sierra Club Nuclear Free Campaign and the Nuclear Energy Information Service, a 32-year-old watchdog group on the nuclear industry in Illinois.

I am here also representing the citizens of Illinois who want to be safe.

After Fukushima, the Nuclear Regulatory Commission ordered its staff to review the 24 Fukushima twin reactors here in the US, of which Illinois has four, two at Dresden and two at Quad Cities. NRC staff was asked to come up with a series of safety recommendations, to make sure that U.S. reactors were adequately safeguarded and protected. A number of safety upgrades were recommended. The Nuclear Regulatory staff presented these recommendations to the NRC commissioners, as you well know. To date, the Nuclear Regulatory Commission has not acted on these safety recommendations. Many groups around the country supported the closing of the 24 Fukushima twin reactors until these safety inspections took place. To date, this recommendation also has not been acted on.

The reason I tell you what you already know is to make the point: How can we have confidence in the Nuclear Regulatory Commission if you don't even listen to the most serious findings of your own staff?

But Illinois has even more in common with Fukushima than just four Fukushima

twin reactors that need to be shut down for safety inspections. At the same time that Fukushima is about to start the high-risk, high-level radioactive-waste fuel transfers out of Unit 3, the Zion Nuclear Generation Plant, 40 miles north of Chicago and midway between Chicago and Milwaukee, is about to start its own fuel transfer operation.

In 2014 over 1,000 tons of radioactive waste, two and a half times the 400 tons being transferred at Fukushima, will be transferred to dry casks at Zion, Illinois. This is the largest scale decommissioning in history.

So, if we can't trust the Nuclear Regulatory Commission to act on its own staff recommendations, how can we have confidence in the NRC acting responsibly in the future?

The second point I have to make is that radioactive “cleanup” is a misleading expression. It suggests to the listener that we can somehow get rid of radioactive “contamination.” But we cannot do so, at least not in any absolute terms. All we can do is move the radioactive contamination from one place to another and find a place to isolate and manage it for a quarter of a million years.

Governments and their electorates have been misled by the nuclear industry into believing false notions about radioactive waste. There is no way to “clean up” and dispose of radioactive waste, except in a temporary manner, by keeping it densely packed in irradiated fuel pools. Dry casks are predicted to last 30-70 years, and that is as far as

the nuclear industry has made plans.

Why am I mentioning that at this point?

Because we can't take a snapshot of one moment in time, such as is suggested with the GEIS, without ignoring that radioactive elements and isotopes will continue to decay and emit significant amounts of radiation for the half lives of the various elements which extend to thousands of years. These chain reactions go on at the subatomic level and they are ever changing. One GEIS at one point in time cannot capture the reality of how atomic and subatomic particles behave.

In closing I want to quote from the movie Pandora's Promise, or, more accurately,

Pandora's Broken Promises, which was mentioned in Oakbrook two nights ago, when the people in Chicago came and gave testimony. A person was walking through the ruins at Fukushima, looked around and said, "This wasn't supposed to happen this way." But it did. And reassurances that have no basis in fact continue to erode our trust in the NRC.

That is why we can't have any confidence in a Generic Environmental Impact Statement.

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