

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Thursday, December 26, 2013 11:18 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW:

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**From:** Janet [mailto:jazarovitz@comcast.net]  
**Sent:** Friday, December 20, 2013 11:34 PM  
**To:** RulemakingComments Resource  
**Subject:**

I base my comments pertaining to the proposed NRC Waste Confidence Rule Draft on Continued Storage of Spent Fuel on reports put out by United States Agencies including the Pentagon, the NRC (Chairman Allison McFarlane), the GAO, Massachusetts Emergency Management Agency Director Kurt C. Schwartz, former NRC Commissioners Gregory Jazcko, and numerous independent scientific organizations including the Union of Concerned Scientists, Physicians for Social Responsibility, the National Academy of Science, the NIRS, as well as nuclear energy professionals and testimony of Massachusetts federal and state legislators. In particular, the Pilgrim Nuclear Power Station is being of primary concern. I have also attended many NRC meetings and have personally heard issues addressed and answers given to questions that are undeniably important to the safety of the plant (s) and the spent fuel storage.

To begin with, the use of the word confidence is to imbue the notion that there might be any *confidence* in the draft statement. There could be none because of the history of the NRC faulty assumptions and its actions. A permanent repository was the basis of the growth of the nuclear industry and of course is not yet built and used. Both Republican and Democratic politicians have stated at public meetings that there never will be one built. It is now generally accepted that those nuclear plants either decommissioned or closed are now the sites of a nuclear waste facility and will remain so for thousands of years. The plants themselves were licensed to run only when producing electrical energy and all designed to be safe and functional for forty years. MANY have already been relicensed, deemed safe with attempts to have them relicensed well before their first license anywhere neared those forty years. At a meeting in April of 2013, when questioned about the factoring of climate change and whether or not it was taken into consideration before relicensing, the answer was no. In the area of the Northeast that I live in, around the PNPS, there were major storms that were never seen in the recent history of the area because of the rising level of the ocean and were never taken into consideration in the original plan or presently, the building of a storage pad-----which was started without any proper permitting approval. The Entergy Corporation up to that time had to have a permit to build

storage buildings and reception tents but not for the beginning of permanent waste storage. Nor is there to be allowed any public participation where the environment has been proven to be compromised.

The idea that the GEIS can be proposed as a GENERIC plan is absurd to begin with. Several plants in the NE and New York State area each have problems unique unto themselves. At Seabrook in New Hampshire, there is concrete degradation and *perhaps* not occurring in other places because of the type of concrete that is used (and there the corporate owners applied for a license renewal in 2012 from 2032, when it is set to expire, to 2052!). At Vermont Yankee in Vernon, VT there has tritium leaking for years and years, at Plymouth NPS, the water temperature of the Cape Cod Bay increase necessitated the plant be shut for days and the numerous plant shutdowns heads the list of number of unplanned shutdowns in the U.S. It was also cited as the second highest chance of earthquake occurrence in the U.S. This an example of another factor that has changed with the passing years of improved technology and geology study. Along with this recognition came one with the Pentagon study saying PNPS was in the top ten highest at risk for terrorist attack. Its vulnerability is UN questioned first, because of its location in the flight path of one of the country's busiest airports-----the site of the take off of the 2001 terrorist air attack on NYC Trade Towers. The roof of the plant is where the spent fuel pool is located, filled to its maximum and outside the containment walls. It is especially vulnerable to attack because the protection is merely a thin tin rook likened to a tin roof as found at a Home Depot. The fact that it is within 50 miles of large, economically important cities with millions and millions of residents, adds to its consideration as a target. It is expected that the fuel pool will be the storage site for a hundred years, destined to remain a waste dump. And an overloaded pool is an added risk for a fire which could be catastrophic.

PNPS has been without any DEP monitoring for almost twenty years. It too has leaked tritium into the groundwater and the source of the leak, untested for years, was only "accidentally" found as reported in the newspaper. For this plan to have its impact on the environment to be labeled as small is beyond logic and scientific basis. No two reactors are alike-----no two reactors sites are alike; they vary on environmental impact and should be evaluated based on individual characteristics.

I don't expect my words to be considered in any decision. No one of us, of the 99% is ever listened to. I feel we are talking to deaf ears. The only voices that are heard are of the 1% and lapdog agencies such as the NRC. But I am totally without hope. Democracy is what the people want, maybe someday it will happen.

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