

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Thursday, December 26, 2013 11:20 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: Nov12th Oakbrook Lewison testimony to NRC Oakbrook Nov 4th.doc  
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**TITLE:** Waste Confidence—Continued Storage of Spent Nuclear Fuel

**COMMENT#:** 00708

**From:** Linda Lewison [<mailto:ljlewis1@gmail.com>]  
**Sent:** Friday, December 20, 2013 11:02 PM  
**To:** Lopas, Sarah; RulemakingComments Resource  
**Subject:** Fwd: Nov12th Oakbrook Lewison testimony to NRC Oakbrook Nov 4th.doc

Dear Sarah:

Enclosed is public testimony for Linda Lewison from November 12th, 2013 from Oakbrook, Illinois pursuant to

"citing Docket ID No. NRC–2012–0246"

Thank you for your prompt confirmation.  
Let me know that you could open this docume

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**Hearing Identifier:** Secy\_RuleMaking\_comments\_Public  
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**Testimony to Nuclear Regulatory Commission**  
**November 4, 2013**  
**Oakbrook, IL**

LINDA LEWISON: I'm Linda Lewison, and I am representing the Sierra Club Nuclear Free Campaign and the Nuclear Energy Information Service, the watchdog of the nuclear industry here in Illinois for the past 32 years.

I want to address my remarks to bring attention to what is going on 40 miles up the road at the Zion Nuclear Power Generation Plant, the site of the largest dismantling or decommissioning of a nuclear reactor in history.

In 2014, over 1,000 tons of high-level radioactive waste is going to be transferred into dry casks, as reported by Pat Daley of Zion Solutions in August 2013.

At Fukushima, Japan, the same fuel transfer of over 400 tons of radioactive waste is being carried out.

What we have here is a situation where we who live in the Chicago-Milwaukee Metropolitan Area, over six million of us, are going to be exposed to comparative or greater risk – from a larger and dirtier radioactive waste fuel transfer than what is taking place at Fukushima. Both projects are expected to take a year to complete.

Although everyone is doing their best at Zion Solutions, a shell company created for the express purpose of managing the Zion decommissioning, and funded by public trust funds of almost a billion dollars, this scale of decommissioning has never been attempted before. We, the people who live within a 50-mile radius of Zion, remain deeply concerned about our safety and we are aware that there really is no “safe” way to manage and isolate radioactive waste. Fuel transfer represents the “safest of the unsafe” solutions to this impossible problem.

The public oversight, accountability and transparency is totally inadequate relative to the enormous risks of the decommissioning project. Irradiated fuel transfers have never been attempted on this scale before.

So, where does a generic environmental impact statement figure into the decommissioning process? The situation at Zion and Fukushima changes from moment to moment, not only at the physical level, which we can see, but, even more critical, at the molecular and subatomic level.

This is a quote from Dr. Gordon Edward, a Canadian physicist and noted authority on radioactive waste:

"The central fact about radioactivity is that no one knows how to turn it off. Radioactive materials continue to emit atomic radiation at a rate that cannot be influenced by any of the usual factors—heat, pressure, chemical reactions, absorption, dilution—nothing can

be used to speed up, slow down, or stop the process of radioactive disintegration from occurring."

This central fact means that 'radioactive cleanup' is a very misleading phrase. It suggests to ordinary people that we can somehow get rid of radioactive contamination. But we cannot do so, at least not in any actual sense. All we can do is move the contamination from one place to another. If you decontaminate one site, you must be contaminating another site. The contamination, whether repackaged, consolidated, or managed, is made less available to the environment of living thing, but it cannot be eliminated. Governments and their electorates have been misled by the nuclear industry into believing false notions about nuclear waste. Lots of impact, millions of dollars spent, they do not know how to do this.

**There is no way to clean up or dispose of radioactive waste.**

So, how can we ever capture one moment in time with something called a Generic Environmental Impact Statement, and presume that it will capture what is happening in this ever-changing reality?

Every reactor site is unique. If they were to drop one cask out at Zion, you could punch a hole in the bottom of the pool. It would partially drain and, in a worst-case scenario, set fuel on fire in a few hours in an order of magnitude greater than Chernobyl. These are catastrophic risks and we cannot address them through the absurdity of a generic impact statement. And these are site-specific impacts in this very densely populated area that we need to take into consideration as we make our future plan.

In closing, we oppose the Nuclear Regulatory Commission's waste confidence draft GEIS and ask NRC to withdraw it for a thorough revision. We have no confidence in the NRC's lack of a plan in place.

As my colleague Shirley Vaine from California put it years ago, **why would we ever support an energy source that had no plans, knew that there was no way to safely dispose of its deadly radioactive waste when it began, hid this from the public, and now leaves us with the creation of endless waste, endless economic and environmental cost, and endless risk to ourselves and to the plant? Why would we ever pick such an energy source in the first place?**