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Docket: NRC-2012-0246

Consideration of Environmental Impacts on Temporary Storage of Spent Fuel After Cessation of Reactor Operation

Comment On: NRC-2012-0246-0361

Waste Confidence - Continued Storage of Spent Nuclear Fuel

Document: NRC-2012-0246-DRAFT-1151

Comment on FR Doc # 2013-21708

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General Comment

Docket ID No. NRC-2012-0246

The NRC Waste Confidence Draft Generic Environmental Impact Statement

Waste Confidence - Continued Storage of Spent Nuclear Fuel: Proposed Rule

Problems exist specific to the Indian Point Nuclear Power Plant that cannot be addressed by a "generic" set of regulations.

For example, the Indian Point Nuclear Power Plant is 35 miles from the most densely populated area of the northeast - New York City. (Some areas of NYC are closer than 35 miles.) As Manhattan is an island with limited points of egress, evacuation on short notice would be impossible. Altogether, 20 million people live within a 50 mile radius of Indian Point. In addition, a new word is needed to describe this potentially necessary emergency process, as the word "evacuation" implies "return;" and, with nuclear contamination, as we have learned from past experience, there is no "return" (as in Chernobyl).

For this reason, a "generic" set of regulations cannot be accepted.

B4. What is the significance of the levels of impact in the DGEIS (SMALL, MODERATE, LARGE)? The NRC describes the affected environment in terms of resource areas: Land use, socioeconomics, environmental justice,

air quality, climate change, geology and soils, surface water, groundwater, terrestrial resources, aquatic ecology, ecology, special status species and habitats, historic and cultural resources, noise, aesthetics, waste management, transportation and public and occupational health. Table 1 indicates the environmental impact - small, moderate or large - of these specified areas:

Short-term storage, Long-term storage and Indefinite storage. "Small" is the predominant description of the environmental impact given in this table. Yet, facts have been presented regarding Indian Point that indicate "large" environmental impact" in these areas.

For example, looking at the area of "public and occupational health," we see that the U.S. Centers for Disease Control and Prevention reports that cancer rates are 66% above the average in the communities surrounding Indian Point. In spite of this report from the U.S. agency reporting on health issues, table 1 of these DGEIS regulations reports a "small" "Health Impact "across the board" - in all areas of Short-term, Long-term and Indefinite storage. It is clear that the DGEIS is not applicable to the specific particularities and problems of Indian Point and that this table is grossly inaccurate.

You could examine each of the resource areas described above and find similar or greater discrepancies.

In regard to "aquatic ecology," fish in the Hudson River have been found to contain traces of strontium-90. The radioactive isotope was discovered leaking at the Indian Point nuclear power plant; and tests on the fish found detectable amounts, as reported by the Westchester Journal News.

In regard to "waste management," a leak in one of the spent fuel pools was accidentally discovered by a workman on the site. Since this discovery, the source of the leak has not yet been found; and water from this crowded spent fuel rod pool continues to leak into the surrounding area - ground, groundwater and river.

These few examples I have given point out the need to reject this DGEIS.

As a resident of New York City and a citizen of these United States, in all due respect, I recommend the NRC go "back to the drawing board" as these proposed generic regulations are completely unacceptable.

Thank you for this opportunity to give comments.