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Subject: PR-51 Waste Confidence
Attachments: 1197 watland.pdf

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NRC DOCKET#: NRC-2012-0246

SECY DOCKET DATE: 12/20/13

TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel

COMMENT#: 00906

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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-2012-0246-0456

Waste Confidence - Continued Storage of Spent Nuclear Fuel; Extension of Comment Period

Document: NRC-2012-0246-DRAFT-1197

Comment on FR Doc # 2013-26726

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General Comment

Docket ID: NRC-2012-0246, The Waste Confidence GEIS is No Excuse for Leaving Dangerous Nuclear Waste at Closed Nuclear Plants

700 Sierra Club Angeles Chapter supporters have signed on to this letter.

Dec 20, 2013

NRC Rulemakings and Adjudications Staff
Washington, DC 20555-0001

To Rulemakings and Adjudications Staff,

The comments that follow are regarding Docket ID NRC-2012-0246.

The Nuclear Regulatory Commission (NRC) should dismiss the findings of its Waste Confidence Generic Environmental Impact Statement. The study is flawed and should not become the excuse for leaving dangerous nuclear waste behind at closed nuclear plants.

I oppose the GEIS findings that highly radioactive nuclear waste can be safely stored in current temporary facilities above ground for the long term on the grounds of the closed San Onofre plant and at similar temporary facilities near all other nuclear plants closed or still operating nationwide.

I support the call by the Sierra Club for the NRC to create a safe, long-term solution for managing and disposing of the nation's spent nuclear fuel and high level radioactive waste.

The U.S. Nuclear Regulatory Commission seeks public input on NRC NUREG-2157, also known as the Waste Confidence Generic Environmental Impact Statement. The apparent intent of this Statement is to justify storing nuclear fuel waste on-site at closed nuclear power plants for decades or even longer, with no requirement to move the waste at any point to a less hazardous location.

The NRC Statement rates the risks of on-site storage as almost insignificant. This is not credible at any site. And because environmental impacts are shown as "generic," no distinction is made of added risks at sites such as San Onofre that are in earthquake and tsunami zones on small and valuable pieces of land near major population centers and transportation corridors.

At best, permanent on-site storage would take these sites out of use for any purpose other than housing waste storage in above ground concrete "mausoleums."

At worst, this dubious policy would put area residents in peril of accidents in spent fuel pools or from long-term decay of dry-cask storage. These perils have been greatly increased by the use of "high burn-up" fuel that is hotter both thermally and radioactively, making it more dangerous to handle and more difficult to store. Currently, high burn-up has no approved means of storage beyond 20 years.

Overall, the proposed NRC Statement underrates risks at all sites, blurs or eliminates the fact of higher risk at some sites, and seeks to walk away from the search for less hazardous sites.

The Sierra Club's bottom line conclusion: There remains no alternative but to continue the hard and necessary work of "creating a safe, long-term solution for managing and disposing of the nation's spent nuclear fuel and high level radioactive waste," in the words of the Nuclear Regulatory Commission's Blue Ribbon Commission, which reported in January 2012.

The NRC should recognize that the attempt to use a GEIS to wish away this problem is fundamentally flawed, and should return to the sound policy proposed by its own Commission.

Thank you for your attention to these concerns.

George Watland, Los Angeles, CA
Glenn Pascall, Dana Point, CA

All 700 supporters signing this letter are included in the attachment.

Attachments

NRC Letter Sierra Club Angeles Chapter

Docket ID: NRC-2012-0246, The Waste Confidence GEIS is No Excuse for Leaving Dangerous Nuclear Waste at Closed Nuclear Plants

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thomas canning
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