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Attention: Docketing and Service Branch

Comments on the NRC "Staff Drafts" for Decommissioning Criteria

It is gratifying that there is at least recognition of the likely need for "licensed termination under restricted conditions" and the requirement for "sufficient financial assurance" from the licensee to allow a non-specified third party to remain responsible for future problems. However, since it is very difficult to predict future health and environmental remediation costs, that non-specified third party (read tax-payer) would be wise to not choose this course but rather to refuse to terminate licenses of problem sites.

The larger problem is that the NRC is still having misty dreams of some ideal community which will welcome tons of radioactive waste with open arms. Passing reference was made to transport risks and virtually no reference to where the waste will go. When will understanding come that moving and covering up the stuff is guaranteeing unpleasant surprises for future generations? The only responsible choice is to sequester nuclear waste where is now is in sturdy, replaceable, and easily monitorable containers, and establish a corps of specialists to monitor the waste for the next few thousands of years.

Maintaining waste in place is not a possibility for the sites which are on or near lands sacred to tribal people. The mentioned case-by-case consideration should apply to removing waste from these locations only.

Since existing sites have limited space the obvious conclusion is that generation of more radioactive materials must cease except for the small amounts of short lived medically useful materials. Until that happens the NRC has no credibility except as a shield for irresponsible industry. To the extent possible over the centuries to come the contractors who benefited from making these mountains of waste and their descendants should remain financially responsible for them. (It is, of course, ridiculous to discuss government or industry continuity and responsibility for the length of time applicable here.)

If the U.S. had spent a fraction of the money earthly nuclear plants have cost on safely harnessing that distant nuclear reactor, the sun, thru wind, photo-voltaics, conservation, and passive solar construction, we would have a much cleaner and safer country. Let us take the first step in that direction now.

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