



Alliance for Progressive Values
Giving Your Values a Voice!

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Dear Sirs:

The Alliance for Progressive Values' statement on the Nuclear Regulatory Commission, Waste Confidence DGEIS and Proposed Rule. Docket ID No. NRC-2012-0246.

APV is deeply skeptical of recent NRC's proposed Waste Confidence Draft Generic Environmental Impact Statement (DGEIS), and we ask the NRC to withdraw it for thorough revision. Below is our critique and suggestions for revision. Special thanks to our friends at Beyond Nuclear for their technical expertise.

Firstly, APV believes that as currently established the nuclear industry in America and elsewhere constitutes a technological dead-end and a very dangerous one at that. Our first and best option as a society should be to transition as quickly as possible away from nuclear fission based energy production and towards clean and renewable sources like wind, tidal and solar. We believe that these resources coupled with gains in efficiency and conservation can eventually solve our dependence on fossil fuels and dangerous nuclear power. Fission reactors generate high-level, deadly waste as a necessary part of their operation, the sooner we begin the process of decommissioning old reactors and replacing them with clean renewable energy sources, the better. The technology to replace nuclear and fossil fuels exists today; it is merely a matter of defying the culture of entropy and greed that currently guides our energy policy. We already have an enormous radioactive waste storage problem; we do not need to make it worse by adding more.

In the case of the HLRW that already exists, we suggest requiring Hardened On-Site Storage (HOSS) as opposed to removing the material. APV joins hundreds of environmental and public interest groups, representing all 50 states, in endorsing the *Statement of Principles for Safeguarding Nuclear Waste at Reactors* (*italics*), which describes HOSS. Quoting Beyond Nuclear's statement: "Where possible, densely-packed, vulnerable HLRW storage pools, at risk of catastrophic fires and radioactivity releases, should be emptied into on-site dry cask storage that is "hardened": designed and built well, safeguarded against accidents, fortified against attacks, and protected against leakage into the environment. This should be expedited as a national security top priority. Locations where HOSS is not safe (places vulnerable to flooding, for example), hardened dry cask storage should be done as close to the wastes' point of generation as possible, as safely as possible. HOSS must be monitored and retrievable, and is but an interim measure. HOSS cannot be a permanent measure on the sea coasts and fresh water sources (rivers, lakes, reservoirs) of our country, due to rising sea levels and risk of leakage into our vital drinking water supplies."

APV strongly disagrees with the NRC's plan for "indefinite storage" at reactor sites. It is ridiculous to

ask the public to believe that these deadly materials, many with radioactive half-lives that make them dangerous hundreds of thousands of years into the future, can be left lying around without a serious plan for their ultimate disposal. The United States is less than a quarter millennia old, civilization took root a bare 6,000 years ago and a scant 10,000 years ago our ancestors began to develop agriculture. Clearly the world can change drastically over time, and yet we are asked to believe the NRC and whatever follows it in time will safeguard this poison for ten times as long as mankind has lived in settled communities. We are being led to believe that under the "indefinite storage" system, the NRC or someone in the future would regularly replace the dry cask storage -- cask pads, inner canisters, and the dry casks themselves every century or so in the future, through sea level fluctuation and ice ages, essentially forever, but even assuming some sense of historical memory and continuity over the eons for which there is no evidence. What happens if the material so degrades over time as to be too dangerous or costly to handle. This is of particular concern in regard to so-called "high burn-up fuel," that has spent more time in an operating reactor core, and is thus significantly more radioactive, thermally hot and prone to actually catching fire. What manner of catastrophe exactly are the bureaucrats at the NRC so glibly bequeathing to generations far in the future?

APV opposes the NRC plan, as outlined in this GEIS, to use the Private Fuel Storage (PFS), LLC "centralized interim storage" proposal, targeted at the Skull Valley Goshutes Band of Indians in Utah, as a model for away-from-reactor storage. Quoting Beyond Nuclear's statement: "Although licensed by NRC for construction and operation, PFS was canceled in December 2012. NRC claims in its GEIS to observe Environmental Justice (EJ) principles, and yet PFS was a blatant violation of EJ. Nearly 500 organizations across the U.S. joined with Skull Valley Goshute traditionals urging NRC to disapprove PFS's license, due to its inherent violation of EJ."

The NRC continues to minimize the threats posed to nearby populations from radiation release caused by events such as pool fires. At present nuclear utilities are authorized to store high-level waste in pools for decades after a reactor permanently shuts down. This is potentially very dangerous, but by doing this utilities can pad their present-day bottom lines by delaying the costly move from pools to dry cask storage. APV suggests transferring HLRW to cask storage as soon as possible after removal from the reactors.

Through further exemptions from regulations the NRC allows utilities to eliminate the 10-mile radius emergency planning zones (EPZs) required for each facility within as little as 12 to 18 months after a reactor is shutdown. As noted above, this clearly ignores the risk of storing HLRW in pools at such shutdown reactor sites. APV has spoken out publicly in the past about the need, not only to enforce the EPZs, but to expand them to a 50 mile radius. We are concerned for populations who may be largely ignorant of the risks or unaware that the EPZs have been dismantled. And of course such problems are only magnified as we move centuries and millennia into the future.

In conclusion, APV opposes the NRC draft plan for Waste Confidence DGEIS. Frankly, as high as the stakes are in regard to nuclear waste storage, we do not feel we can trust the industry, nor do we feel we can trust the regulators. And at its heart, we do not trust the technology itself. We are making a deadly mess that will last so far into the future that it can scarcely be imagined and leaving it for generations whose technological skills and societal framework, we cannot hope to predict. We have already gone too far. We must stop now and begin to seriously come to grips with the damage we have already done.