

January 7, 2014

**UNITED STATES OF AMERICA
BEFORE THE NUCLEAR REGULATORY COMMISSION**

In the Matter of)	
)	
Proposed Rule: Waste Confidence –)	
Continued Storage of Spent Nuclear Fuel)	Docket No. 2012-0246
10 C.F.R. Part 51)	
)	
Draft Waste Confidence Generic)	
Environmental Impact Statement)	

Errata for Declaration of Dr. Arjun Makhijani Regarding the Waste Confidence Proposed Rule and Draft Generic Environmental Impact Statement

On December 20, 2013, thirty-three environmental groups¹ submitted the Declaration of Dr. Arjun Makhijani in support of their comments on the Draft Waste Confidence Generic Environmental Impact Statement and proposed Waste Confidence rule and a related petition for rulemaking. These groups respectfully submit the following errata to Dr. Makhijani's declaration:

Page in Original	Paragraph and Sentence in Original	Correction
2	Second full paragraph, second sentence	Delete the words "compliance of" and add "'s compliance" after "Los Alamos National Laboratory so that the sentence reads ". . . independent audits of the Los Alamos National Laboratory's compliance with the radiation . . ."
2	Second full paragraph, last sentence	Add the abbreviation "(APS)" after "American Physical Society"
3	Second full paragraph	Change the paragraph number from "1.8" to "1.9"

¹ Alliance to Halt Fermi 3, Beyond Nuclear, Blue Ridge Environmental Defense League, Center for a Sustainable Coast, Citizens Allied for Safe Energy, Citizens' Environmental Coalition, Don't Waste Michigan, Ecology Party of Florida, Friends of the Coast, Friends of the Earth, Georgia Women's Action for New Directions, Green State Solutions, Hudson River Sloop Clearwater, Missouri Coalition for the Environment, NC WARN, Nevada Nuclear Waste Task Force, New England Coalition, No Nukes Pennsylvania, Northwest Environmental Advocates, Nuclear Energy Information Service, Nuclear Information and Resource Service, Nuclear Watch South, Physicians for Social Responsibility, Public Citizen, Promoting Health and Sustainable Energy, Radiation and Public Health Project, Riverkeeper, SEED Coalition, San Clemente Green, San Luis Obispo Mothers for Peace, Snake River Alliance, Southern Alliance for Clean Energy, and Vista 360

3	First paragraph after header “2.0 Purpose of Declaration . . .” second sentence	Make uppercase the “D” in “draft Waste Confidence Generic Environmental Impact Statement”
4	First paragraph, second complete sentence	Make uppercase the “D” in “draft GEIS”
5	First paragraph, last sentence	Change “long term” to “long-term”
6	Second full paragraph, seventh sentence	Delete the space between the period at the end of the sentence and the footnote reference
6	Last paragraph, second sentence	Delete the space between the period at the end of the sentence and the footnote reference
8	Second header “A. Proposed Rule”	Insert a tab before “A.” and insert a tab after “A.” before “Proposed Rule”
13	First full paragraph, first sentence	Change the word “study” to “Pilot Study”
13	First full paragraph, fourth sentence	Insert the abbreviation “(PWR)” after “pressurized water reactors”
13	First full paragraph, seventh sentence	Define “Nuclear Waste Technical Review Board” as “(NWTRB)” so that the sentence begins “As the Nuclear Waste Technical Review Board (NWTRB) . . .”
13	First full paragraph, seventh sentence	Insert a comma after the phrase “pointed out”
16	First full paragraph, first sentence	Unbold the word “The”
16	Footnote 56, second sentence	Add an “s” to the word “failure”
21	Third paragraph, second sentence	Insert a comma after the phrase “credible impact analysis”
21	Footnote 65	Change font size to 11pt
22	First paragraph, first sentence	Change “EIS” to “waste confidence GEIS”
22	First paragraph, second sentence	Change “GEIS” to “waste confidence GEIS”
23	Header “D. View of other institutions . . .”	Make uppercase the first letter of the words “other”, “institutions”, “high”, “burnup”, “spent”, and “fuel” and insert a tab after the letter “D.” so that the header reads “D. View of Other Institutions on High Burnup Spent Fuel”
23	Last paragraph, first sentence	Define “environmental impact statement” as “EIS” so that the sentence begins, “We are aware that an agency preparing an environmental impact statement (EIS) . . .”
24	Header “E.”	Insert a tab after the letter “E.” before “Effect of Degradation of Storage Impacts”
26	Description below graphic	Insert parenthesis before “p.56” so that the citation reads “(Reproduced from NWTRB 2010, Figure 21 (p.56))”
30	Header “G.”	Insert tab after the letter “G.” before “Other Forms of Spent Fuel . . .”

30	First paragraph, last sentence	Make uppercase the “D” in “draft”
31	First paragraph after header “5.0”	Change “EIS” to “GEIS”
33	First paragraph after bullets	Change paragraph number “6.3” to “6.4”
33	Second paragraph after bullets	Change paragraph number “6.4” to “6.5”
33	Second paragraph, last sentence	Change “see paragraph 6.6 below” to “see paragraph 6.7 below”
33	Third paragraph after bullets	Change paragraph number “6.5” to “6.6”
33	Fourth paragraph after bullets	Change paragraph number “6.6” to “6.7”
34	First incomplete sentence	Delete comma after “quality objectives” so that the end of the sentence reads “quality objectives would have come to a halt”
34	First full paragraph	Change paragraph number “6.7” to “6.8”
34	Second full paragraph	Change paragraph number “6.8” to “6.9”
34	Third full paragraph	Change paragraph number “6.9” to “6.10”
35	First full paragraph	Change paragraph number “6.10” to “6.11”
35	Second full paragraph	Change paragraph number “6.11” to “6.12”
35	Second full paragraph, second sentence	Insert “EPA” after “Similarly,” and delete “of the EPA” after “regulations” so the sentence begins “Similarly, EPA regulations for . . .”
35	Third full paragraph	Change paragraph number “6.12” to “6.13”
35	Third full paragraph, fourth sentence	Change “6.13” to “6.14”
35	Last paragraph	Change paragraph number “6.13” to “6.14”
36	First full paragraph	Change paragraph number “6.14” to “6.15”
36	Second full paragraph	Change paragraph number “6.15” to “6.16”
38	Header “8.0 The Draft EIS . . .”	Change “EIS” to “GEIS”
40	First full paragraph, first sentence	Insert “be” after “assures that there will” so that the sentence reads “The proposed rule neither puts limits on spent fuel nor assures that there will be sufficient room . . .”
40	Second full paragraph, first sentence	Insert a period after “(Section B.2.2)”
40	Second full paragraph, second sentence	Insert the abbreviation “(WIPP)” after “Waste Isolation Pilot Plant” so that it reads “. . . to the Waste Isolation Pilot Plant (WIPP) in New Mexico . . .”
40	Footnote 119	Change font to the color black
44	First full paragraph, second sentence	Define “Nuclear Waste Policy Act” as “(NWPA)” so that the sentence reads “. . . following the passage of the Nuclear Waste Policy Act (NWPA) in a 1983 study . . .”
45	Header “9.0 The EIS Should Acknowledge . . .”	Change “EIS” to “Draft GEIS”
48	First full paragraph, first	Add a period after “ground” and delete the “/” so

	sentence	that the sentence ends “. . . indefinitely on the ground. An assumption . . .”
49	Second full paragraph, first sentence	Change “of” to “is” so that the sentence reads “The other regulation that covers high-level waste disposal impacts is Table S-3 . . .”
49	Fifth full paragraph, first sentence	Change “GEIS” to “Draft GEIS”
50	First paragraph, first sentence	Change “GEIS” to “Draft GEIS”
50	Second paragraph, only sentence	Change “long term” to “long-term”
1-56	Page number in footer	Make font Times New Roman and change to size 12

A corrected copy of Dr. Makhijani’s Declaration is attached.

Respectfully submitted,

Signed (electronically) by:

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