

Public Meeting Comments from Southern Alliance for Clean Energy Regarding the NRC's
Waste Confidence DGEIS – Orlando, Florida – November 6, 2013

My name is Mandy Hancock and I am the high-risk energy organizer with the Southern Alliance for Clean Energy (SACE). We are a regional non-profit organization with members here in Florida, and across the Southeastern U.S. We are concerned about the impacts energy choices have on our health, economy and environment. Thank you for holding tonight's public meeting.

Before I comment on the draft generic environmental impact statement (DGEIS), I'd like to address the accessibility of this meeting location. A meeting in Atlanta, Georgia was requested by U.S. Representative Hank Johnson, which was echoed by several organizations including SACE. Despite Atlanta having 11 nuclear reactors within 170 miles, compared to the 5 reactors within 215 miles of Orlando, the NRC denied the request citing in part a lack of resources. This is surprising rationale, considering the location of NRC's Region II headquarters in the city. Atlanta is also a major metro area and serves as a hub for airline and bus transportation from multiple surrounding states, which would have made it much more accessible and affordable than Orlando to organizations and residents from many reactor communities. I personally know of several people in Atlanta that were forced to travel nearly 6 hours to attend the Charlotte hearing on Monday. We still request that an additional meeting be held in Atlanta.

Now for my comments. The Court ruling to which the NRC is responding with this draft GEIS requires the NRC to *examine the risks* of spent fuel storage, and did not allow NRC to merely *assume* that storage would be safe. Instead of examining what would happen if spent fuel remained unprotected at reactors sites indefinitely, the NRC *assumed* that spent fuel would be safely managed in surface storage for an indefinite period. To this end, the NRC is essentially involved in the same fallacy that rendered the Waste Confidence Rule insufficient. Just as we cannot assume that long-term geologic storage will be secured, we cannot assume that indefinite storage onsite will be safe. To act under these assumptions is inconsistent with the Nuclear Waste Policy Act and violates the NRC's own regulations.

Instead of these assumptions, the NRC should draft a new GEIS to examine:

- the probability that a geologic repository will be successfully sited,
- the probability that a successfully sited repository will actually contain radiation,
- the degree to which a repository may leak radiation, and
- the public health and environmental consequences that may occur if a repository is not sited or if it ineffectively contains radioactivity.

The proposed action of the draft GEIS is to issue a rule that, if adopted, would not require consideration of the environmental impacts of continued onsite, surface storage at individual reactor sites.¹ That is absurd and unacceptable as it fails to address the circumstances at individual reactor locations. For instance, several reactor sites in our region are in ecologically sensitive areas, including Florida Power & Light's Turkey Point near Miami, which is situated between the Everglades National Park and Biscayne Bay.

¹ Nuclear Regulatory Commission, *Waste Confidence Generic Environmental Impact Statement*, September 2013, p. xxiv. Can be found at: http://www.ips-dc.org/reports/spent_nuclear_fuel_pools_in_the_us_reducing_the_deadly_risks_of_storage

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Given Turkey Point's location, sea level rise and storm surges are real threats that must be considered. Can the NRC ensure that spent nuclear fuel can safely sit at Turkey Point for even one hundred years let alone indefinitely?

Likewise, Southern Company's Plant Vogtle in Georgia is located on the endangered Savannah River.² In addition to being in a sensitive ecosystem, Plant Vogtle is also located across the river from the Savannah River Site (SRS), yet no consideration was given to the cumulative impacts of having reactors and corresponding nuclear waste in such close proximity to a highly contaminated Department of Energy radioactive waste site. Additionally, both Vogtle and Turkey Point are slated for more reactors and thus, if built, even more toxic radioactive waste would be generated. The NRC cannot turn a blind eye to the unique characteristics of each site and each community.

Communities in the Southeast region bear a heavy load of the burden when it comes to highly radioactive spent nuclear fuel. There are only five states with over 3,000 metric tons of spent fuel, and two of those are in the Southeast (North Carolina and South Carolina).³ Of the 104⁴ licensed reactors in the country, 33 of them are in our region, and all five of the reactors currently under construction are here.⁵

While the NRC has 'confidence' that long-term geologic storage will eventually be found, the public has lost 'confidence' in the NRC to adequately address their unique and important concerns. This is especially true in light of this draft GEIS that is based on erroneous assumptions and has the NRC 'confident' that spent fuel will be safe onsite, for an indefinite period of time – a period that could be literally forever. Yet just last month, much of our government shut down for two weeks, prompting the NRC to furlough roughly 90% of its employees. How can the NRC guarantee that radioactive waste here in Florida and across the country can remain safely onsite for thousands of years when the public can't even be guaranteed that the government will be operating next year?

The bottom line is this -- the public's 'confidence' has run out. We respectfully request that the NRC stop assuming that spent fuel can be stored safely forever.

Thank you.

² The Savannah River has been listed on various "endangered places" lists for several years over the last decade. Interestingly enough, a Google search on the topic instantly yields a link to an internal NRC email dated September 27, 2007 on the subject, with specific mention of radioactivity released from SRS. Email can be found at this link: <http://pbadupws.nrc.gov/docs/ML0727/ML072700503.pdf>

³ Alvarez, Robert, *Spent Nuclear Fuel Pools in the U.S.: Reducing the Deadly Risks of Storage*, May 2011, Appendix B, p. 28. http://www.ips-dc.org/reports/spent_nuclear_fuel_pools_in_the_us_reducing_the_deadly_risks_of_storage

⁴ 100 reactors are currently operating: Crystal River 3 in FL, Kewaunee in WI and San Onofre in CA have recently closed.

⁵ The 5 under active construction are TVA's Watts Bar 2 in TN, Southern Company's Vogtle 3 & 4 in Georgia, and SCE&G's V.C. Summer 2 & 3 in South Carolina.