Dec. 20, 2013

Dear NRC Nuclear Waste Confidence Directorate,

Please find attached a double-sided pamphlet written (in Dec. 2012, and updated in Nov. 2013) by Beyond Nuclear board member Kay Drey of St. Louis, MO, entitled “ROUTINE RADIOACTIVE RELEASES FROM U.S. NUCLEAR POWER PLANTS.”

I submit it as public comment on NRC’s Waste Confidence Draft Environmental Impact Statement, because whether re: impacts on Groundwater (Section E.2.2.1), Surface Water (Section E.2.2.2), Soils (Section E.2.2.3), or Public Health (Section E.2.2.4), as summarized in Section E.2.2.5 on Page E-19, NRC has determined, incredibly, that the impact of radioactivity leakage from high-level radioactive waste storage pools is “SMALL.”

We beg to differ. This pamphlet, while focused on “routine radioactive releases,” also touches on “leaks” – which, because they happen so often, unfortunately, could be referred to as “routine” at nuclear power plants – although there is nothing “routine” or “small” about them, in terms of their impacts on the environment and human health.

As shown in the diagram published by NRC that is featured on the cover of the pamphlet, radioactivity, once leaked from a high-level radioactive waste storage pool, can and will “cycle” back through the ecosystem and food chain (bio-concentrating there), to harm humans (with the most concentrated, and thus harmful, doses, as we sit at the top of the food chain).

I have also attached a diagram of the human body, prepared by Russell Hoffmann, that shows where in the human body various radioactive poisons lodge, and concentrate, and do their primary damage.

Given NAS’s affirmation for decades, in its seven Biological Effects of Ionizing Radiation (BEIR) reports, that any exposure to ionizing radioactivity carries a health risk for cancer, and these risks accumulate over a lifetime, I cannot understand how NRC has determined that radioactivity leakage from pools will have a SMALL impact on people and the environment!

Please note that this “ROUTINE RADIOACTIVE RELEASES FROM U.S. NUCLEAR POWER PLANTS” pamphlet, on its flipside, includes a map of the U.S., showing atomic reactor sites, and the surface waters into which their pools either already do leak or have leaked (as documented in NRC’s Table E-4 on Page E-20, at Hatch in GA, Indian Point in NY, Palo Verde in AZ, Salem in NJ, San Onofre in CA, Seabrook in NH, and Watts Bar in TN; as documented by David Lochbaum of UCS, in his comments to this proceeding, at Yankee Rowe in MA, as well as Brookhaven National Lab on Long
Island, NY), or else could yet leak someday. The NRC WC DGEIS, as at Table E-4, currently lacks specific information, as to which surface waters pools have leaked into, are yet leaking into, or could someday leak into.

Thank you.

Sincerely,

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