



HEALTH PHYSICS SOCIETY

"Specialists in Radiation Safety"

December 18, 2013

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

[Submitted electronically to www.regulations.gov]

Subject: Docket ID No. NRC-2012-0246, Draft Report for Comment, Waste Confidence Generic Environmental Impact Statement

The attached comments are submitted on behalf of the Health Physics Society (HPS)¹, a professional organization whose mission is to promote excellence in the science and practice of radiation safety. The HPS appreciates the opportunity to respond to the solicitation of public comments on the Draft Waste Confidence Generic Environmental Impact Statement and Proposed Rule.

The attached comments were developed by the Power Reactor Section of HPS and approved by the HPS President Darrell Fisher. We would be pleased to answer any questions they generate.

Sincerely,

Richard J. Vetter
Health Physics Society

Draft Report for Comment
Waste Confidence Generic Environmental Impact Statement
NUREG-2157
[Docket ID No. NRC-2012-0246]

Comments from the Health Physics Society
December 20, 2013

General Comments

The HPS supports the analysis and conclusions of the Waste Confidence Generic Environmental Impact Statement (GEIS) and Proposed Rule. We are particularly pleased that the staff report supports the conclusion that environmental impacts from all three timeframes are adequately small to support proceeding with the rulemaking. This conclusion is consistent with our HPS Position Statement PS022-1, "Managing Spent Nuclear Fuel," revised June, 2007.

Members of the HPS participated in the informative webinars provided by the NRC as well as public meetings held in various regions across the country. We were satisfied that the GEIS addressed the use of high burnup fuel, mixed oxide fuel, stainless steel cladding, small modular reactors and other peripheral issues being raised in objection to the proposed rulemaking. The second issue of concern to members of the public is the potential for fire in a spent fuel pool caused by reduced water inventory. The GEIS has also adequately addressed this very low potential environmental impact.

The HPS Position Statement provides four concluding recommendations:

- Spent fuel should be maintained such that it may be retrieved for future use as a potential resource.
 - The GEIS supports three storage timeframes that include both implementation of a repository and failure to secure a repository. The GEIS does not cover reprocessing and therefore is appropriately silent on the potential for spent fuel to be used for reprocessing.
- An independent study should be undertaken to determine the best course of action for at-reactor storage, centralized storage, or some other configuration or location.
 - The HPS notes that the NRC has restarted a review of the Department of Energy license application for the Yucca Mountain repository. That decision is also appropriately outside the scope of the GEIS.
- Radiation protection standards should apply to an interim period of up to a 300 year storage period.
 - The HPS has a position statement on public radiation exposure, PS005-3, Ionizing Radiation Safety Standards for the General Public that supports a 1 mSv/yr dose limit. The HPS is pleased that the NRC has not proposed a

different standard for spent fuel storage nor is there a proposal to change the standard over time.

- Appropriate radiological monitoring should be required for the environment surrounding the storage facility.
 - The regulations for spent fuel storage include adequate requirements for a Radiological Environmental Monitoring Program (REMP). No additional requirements are justified.

Specific Comments

None