

From: Sara Barczak <sara@cleanenergy.org>
To: <nrcprep@nrc.gov>
Date: Fri, May 30, 2003 2:13 PM
Subject: Response from "Comment on NRC Documents"

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Rules and Directives Branch
US NRC

Below is the result of your feedback form. It was submitted by
Sara Barczak (sara@cleanenergy.org) on Friday, May 30, 2003 at 14:13:40

Document_Title: NUREG-1768: Package Performance Study Test Protocols

Comments:

May 30, 2003

Spent Fuel Project Office, Attn: Ms. Amy Snyder
Mail Stop O14-D13
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001
RE: Comments on NUREG-1768: Package Performance Study Test Protocols

Ms. Snyder:

Southern Alliance for Clean Energy (SACE) is a regional non-profit conservation and energy consumer organization. We have members throughout Georgia and the Southeast and have focused on energy policy, including nuclear issues, for over 20 years. SACE has several concerns regarding the NRC's draft test protocol for the Package Performance Study including the fact that public meetings were not held anywhere in the Southeast, especially given the large amount of nuclear waste that will travel throughout the region.

Nuclear Power is Not a Safe or Clean Energy Source:
SACE does not view dry casks as a safe means for storing, managing, or transporting nuclear utilities' overflowing nuclear waste volumes. Radioactive spent fuel, generated by nuclear power plants, is highly toxic and remains radioactive for millions of years. Ensuring safer cask designs is a necessary requirement, but communities in the Southeast and across the nation, whether they are near reactors, along transportation routes, or the site of a nuclear waste dump, will still be at risk as long as nuclear power plants and their waste exist. Dry casks currently in use, along with future designs, will not be infallible or considered fully "safe," no matter how robust the design or how rigorous the testing or how vigilant the enforcement.

Nuclear Power and its Radioactive Waste Invite Terrorism:
Storing dangerous, highly radioactive spent nuclear fuel outside at reactors in casks or transporting casks throughout the country presents an inviting terrorist target and puts all affected communities at risk. Full-scale, physical testing of each cask design to failure under representative loading conditions should be conducted, including but not limited to: explosive testing, immersion, thermal, puncture, crush,

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Call - A. Snyder (AHS0)
A.S. Murphy (A5M1)

and real-world crash tests.

At nuclear Plant Hatch in South Georgia, Holtec HI-STAR and HI-STORM casks sit outdoors near the banks of the Altamaha River, deemed one of the nation's most endangered rivers in 2002 by the American Rivers organization. The Altamaha flows into prime fishing, crabbing, and shrimping areas and is near Georgia's famous Golden Isles, a prime tourist destination that is heavily reliant on a healthy environment. Failure by the NRC to require the most stringent testing measures on all aspects of cask integrity would jeopardize the economic health and well being of the area. Furthermore, the Port of Savannah is one of the most active ports on the East Coast and an accident or attack on a barge carrying nuclear waste for instance could potentially devastate the economic vitality of the growing port and surrounding coastal communities.

Sincerely,

Sara Barczak, Safe Energy Director, Savannah

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