

# INDIAN POINT SAFE ENERGY COALITION

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August 5, 2004

Roy Zimmerman  
Director of Nuclear Security and Incident Response (NSIR)  
NRC Headquarters  
Washington, DC 20555

Dear Mr. Zimmerman:

On behalf of the Indian Point Safe Energy Coalition, we are writing you regarding the important issue of safeguarding the spent fuel storage systems at the Indian Point nuclear power plant, which is situated only 35 miles from midtown Manhattan. Members of the Indian Point Safe Energy Coalition recently attended the July 15, 2004, NRC public meeting regarding Entergy's proposed dry cask spent fuel storage system for Indian Point. We are writing you at the recommendation of Larry Camper, Deputy Director of the Spent Fuel Office; John Monninger, Chief of the Licensing Section in the Spent Fuel Project Office; and Francis Young, from Nuclear Security and Incident Response. These gentlemen said that they were unfamiliar with Hardened Onsite Storage (HOSS) [a term coined by Dr. Arjun Makhijani, President of the Institute for Energy and Environmental Research] as a way of protecting spent fuel at nuclear power plants.

Mr. Young stated that he was unsure whether the current Entergy plan for moving spent fuel into a dry cask independent spent fuel storage installation (ISFSI) would provide more or less security than one in which the spent fuel was stored in a HOSS dry cask ISFSI. A HOSS plan would include:

- 1 moving the irradiated fuel older than five years – which represents much of the fuel in the pools – into “hardened” dry cask storage. Stored in hardened dry casks and dispersed and shielded appropriately, the irradiated fuel is less vulnerable to an accident, sabotage or terrorist attack.
- 2 employing structural security measures – such as soil berms, beamhenge (steel cable system), above-ground bunkers, and containment buildings – to protect the dry casks. Entergy's proposal involves storing the casks on an open concrete storage pad with no overhead protection. Soil berms, above-ground bunkers and containment buildings can be used to shield the casks from line-of-sight so that the casks are not as vulnerable to acts of terrorism involving hand-held weaponry (i.e. anti-tank missiles) or aircraft.
- 3 designing the hardened dry cask storage system based upon the latest seismic hazard data for the Ramapo Fault, above which Indian Point sits. Lamont-Doherty Earth Observatory is a leader in this research.
- 4 significantly reducing the density of the fuel assemblies within the irradiated fuel pools. The current spacing between fuel assemblies is dangerously close which increases the probability of an irradiated fuel fire and the likelihood that the fire would engulf more irradiated fuel and release greater amounts of radioactivity.

(A more in-depth report describing and justifying a HOSS formulation called Robust Storage is provided in the included document.)

NRC staff stated at this meeting that if we provided the enclosed information to you, we would receive a definitive NRC response in writing stating which of these ISFSI plans would provide greater security.

From our standpoint, the Department of Energy, Nuclear Regulatory Commission and the Entergy Corporation have not put forth a viable solution to the nuclear waste dilemma that plagues Indian Point. Given the serious nature of this issue to public health and safety, we expect to hear back from you within 45 days.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Jacobs', with a stylized, cursive script.

Mark Jacobs  
Indian Point Safe Energy Coalition

cc: Brian Holian, Region I  
Larry Camper, Deputy Director of the Spent Fuel Office  
John Monninger, Chief of the Licensing Section in the Spent Fuel Project Office  
Francis Young, Nuclear Security and Incident Response