

February 6, 2009

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE SECRETARY

Waste Confidence Decision Update)
10 C.F.R. Part 51) Docket ID – 2008-0482
73 Fed. Reg. 59,551 (Oct. 9, 2008))
_____)

Proposed Rule: Consideration of) RIN: 3150-A147
Environmental Impacts of Temporary) Docket ID – 2008-0404
Storage of Spent Fuel After Cessation)
Of Reactor Operation)
10 C.F.R. Part 51)
73 Fed. Reg. 59,547 (Oct. 9, 2008))
_____)

**DECLARATION BY DR. GORDON R. THOMPSON IN SUPPORT OF HIS
CRITIQUE OF NRC'S WASTE CONFIDENCE DECISION AND
ENVIRONMENTAL IMPACT DETERMINATION**

I, Dr. Gordon R. Thompson, declare as follows:

1. I am the executive director of the Institute for Resource and Security Studies (IRSS), a nonprofit, tax-exempt corporation based in Massachusetts. Our office is located at 27 Ellsworth Avenue, Cambridge, MA 02139. IRSS was founded in 1984 to conduct technical and policy analysis and public education, with the objective of promoting peace and international security, efficient use of natural resources, and protection of the environment. I am an expert in the technical analysis of safety, security and environmental issues related to nuclear facilities. A copy of my curriculum vitae is included as Attachment 1 to this declaration.

2. I received an undergraduate education in science and mechanical engineering at the University of New South Wales, in Australia. Subsequently, I pursued graduate studies at Oxford University and received from that institution a Doctorate of Philosophy in mathematics in 1973, for analyses of plasmas undergoing thermonuclear fusion. During my graduate studies I was associated with the fusion research program of the UK Atomic Energy Authority. My undergraduate and graduate work provided me with a rigorous education in the methodologies and disciplines of science, mathematics, and engineering.

3. Since 1977, a significant part of my work has consisted of technical analyses of safety, security and environmental issues related to nuclear facilities. These analyses have been sponsored by a variety of nongovernmental organizations and local, state and national governments, predominantly in North America and Western Europe. Drawing upon these analyses, I have provided expert testimony in legal and regulatory proceedings, and have served on committees advising US government agencies. To illustrate my expertise, I provide in the following paragraphs some details of my experience.

4. I have conducted, directed, and/or participated in a number of studies that evaluated aspects of the design and operation of nuclear facilities with respect to severe accident probabilities and consequences. These include generic studies and studies of individual facilities. For instance, with respect to generic studies on the potential for severe accidents at nuclear power plants, I was co-investigator in a study by the Union of Concerned Scientists on the "source term" issue – the potential for release of radioactive material to the environment.¹ Also, I was one of a team of four scientists who prepared, for Greenpeace International, a comprehensive critique of the state of the art of probabilistic risk assessment (PRA) for nuclear power plants.² Our report noted that acts of malice, such as sabotage and acts of war, are not considered in PRAs, despite a history of malicious acts at many nuclear facilities. In addition, I conducted analysis on the relevance of PRA to emergency response planning, as part of a study on emergency planning for nuclear power plant accidents.³ All of these studies required me to be highly familiar with the design and operation of nuclear power plants, as well as the characteristics of probabilistic risk assessment.

5. I have also done considerable work on the risks posed by individual nuclear facilities. In addition to performing the studies described elsewhere in this declaration, I have studied the risks posed by the Seabrook, Pilgrim, Vermont Yankee, Diablo Canyon, and Three Mile Island plants (USA), the Darlington and Pickering stations (Canada), the Sizewell B station (UK) and the Dukovany plant (Czech Republic). All of these studies required me to become familiar with the relevant details of the design and operation of the facilities involved.

6. To a significant degree, my work has been accepted or adopted by relevant governmental agencies. During the period 1978-1979, for example, I served on an international review group commissioned by the government of Lower Saxony (a state in Germany) to evaluate a proposal for a nuclear fuel cycle center at Gorleben. I led the subgroup that examined accident risks and identified alternative options with lower risk.⁴ One of the risk issues that I identified and analyzed was the potential for self-sustaining,

¹ Steven Sholly and Gordon Thompson, The Source Term Debate (Cambridge, Massachusetts: Union of Concerned Scientists, January 1986).

² H. Hirsch et al, IAEA Safety Targets and Probabilistic Risk Assessment (Hannover, Germany: Gesellschaft für Ökologische Forschung und Beratung mbH, August 1989).

³ D. Golding et al, Preparing for Nuclear Power Plant Accidents (Boulder, Colorado: Westview Press, 1995).

⁴ Jan Beyea, Yves Lenoir, Gene Rochlin and Gordon Thompson (subgroup chair), Report of the Gorleben International Review, Chapter 3: Potential Accidents and their Effects, submitted (in German) to the Government of Lower Saxony, March 1979.

exothermic oxidation reactions of fuel cladding in a high-density spent fuel pool if water is lost from the pool. Hereafter, for simplicity, this event is referred to as a "pool fire".⁵ In examining the potential for a pool fire, I identified partial loss of water as a more severe condition than total loss of water. I identified a variety of events that could cause a loss of water from a pool, including aircraft crash, sabotage, and acts of war. Also, I identified and described alternative fuel storage options with lower risk; these lower-risk options included design features such as spatial separation, natural cooling and underground vaults. The Lower Saxony government accepted my findings about the risk of a pool fire, and ruled in May 1979 that high-density pool storage of spent fuel was not an acceptable option at Gorleben. As a direct result, policy throughout Germany has been to use dry storage in casks, rather than high-density pool storage, for away-from-reactor storage of spent fuel.

7. My work has also influenced decision making by safety officials in the U.S. Department of Energy (DOE). During the period 1986-1991, I was commissioned by environmental groups to assess the safety of the military production reactors at the Savannah River Site, and to identify and assess alternative options for the production of tritium for the US nuclear arsenal. Initially, much of the relevant information was classified or otherwise inaccessible to the public. Nevertheless, I addressed safety issues through analyses that were recognized as accurate by nuclear safety officials at DOE. I eventually concluded that the Savannah River reactors could not meet the safety objectives set for them by DOE.⁶ DOE subsequently reached the same conclusion, and scrapped the reactors. The current national policy for tritium production is to employ commercial reactors, an option that I had concluded was technically attractive but problematic from the perspective of nuclear weapons proliferation.

8. In 1977, and again during the period 1996-2000, I examined the safety of nuclear fuel reprocessing and liquid high-level radioactive waste management facilities at the Sellafield site in the UK. My investigation in the latter period was supported by consortia of local governments in Ireland and the UK, and I presented my interim findings at briefings in the UK and Irish parliaments in 1998. I identified safety issues that were not addressed in any publicly available literature about the Sellafield site.⁷ As a direct result of my investigation, the UK Nuclear Installations Inspectorate (NII) required the operator of the Sellafield site -- British Nuclear Fuels (BNFL) -- to conduct extensive safety analyses. These analyses confirmed the significance of the safety issues that I had identified, and in January 2001 the NII established a legally binding schedule for reduction of the inventory of liquid high-level radioactive waste at Sellafield.⁸ The NII

⁵ At water-cooled reactors, the fuel cladding is made from a zirconium alloy that can enter into a vigorous exothermic oxidation reaction with either air or steam. For simplicity, this reaction can be referred to as a "fire".

⁶ Gordon Thompson and Steven C. Sholly, No Restart for K Reactor (Cambridge, Massachusetts: Institute for Resource and Security Studies, October 1991).

⁷ Gordon Thompson, High Level Radioactive Liquid Waste at Sellafield: Risks, Alternative Options and Lessons for Policy (Cambridge, Massachusetts: Institute for Resource and Security Studies, June 1998).

⁸ Nuclear Installations Inspectorate, "Specification Issued under Licence Condition 32(4) for the Limitation of the Accumulation or Storage of Liquid High Level Radioactive Waste in B215. Licence Instrument 343. January 2001."

took this action in recognition of the grave offsite consequences of a release to the environment from the tanks in which liquid high-level waste is stored. I had identified a variety of events that could cause such a release, including acts of malice or insanity.

9. In May 2000 I completed a study for Greenpeace International on the hazard potential of the La Hague site in France.⁹ Nuclear fuel reprocessing and related activities are conducted at this site. The operator of the site – COGEMA – was authorized to store 14,000 tonnes of spent fuel in high-density pools at La Hague, and proposed to increase the capacity of these pools to 17,600 tonnes. My study described the potential for a pool fire at La Hague, and identified events – including acts of malice or insanity – that could lead to a pool fire. One of the findings of my study was that neither COGEMA nor the French government had a thorough understanding of La Hague's hazard potential, including the potential for a pool fire. Subsequent to the attacks of 11 September 2001 in New York and Washington, media exposure brought La Hague's hazard potential to the attention of the French government. During October 2001 the French government deployed anti-aircraft missiles at La Hague.

10. As stated in paragraph 6, I determined in the period 1978-1979 that partial loss of water from a high-density spent fuel pool is a more severe condition than total loss of water. This is because convective heat transfer is suppressed by the presence of residual water at the base of the fuel assemblies. During any scenario for loss of water from a spent fuel pool, there will be a period of time during which residual water is present. As a result, comparatively old fuel – potentially including fuel aged 10 or more years after discharge from a reactor – can ignite if water is lost from a high-density spent fuel pool. The NRC Staff failed, for more than two decades, to understand this point. An illustration of the Staff's lack of understanding was provided by its statements during a license amendment proceeding in regard to the expansion of spent fuel pool capacity at the Harris nuclear power plant. I served as an expert witness for Orange County, North Carolina, the intervenor in this proceeding. In filings during March and April 2000, the Staff repeatedly disparaged my statements that comparatively old fuel can ignite. A few months later, however, the Staff adopted my position. In a report dated October 2000, but not published until January 2001, the Staff recognized that the flow of air to exposed fuel assemblies could be blocked by the presence of collapsed structures – which might be attributable, for example, to a cask drop or an earthquake – or by the presence of residual water.¹⁰ The Staff analyzed the heat transfer implications of flow blockage and concluded:¹¹

"While the February 2000 [draft] study indicated that for the cases analyzed a required decay time of 5 years would preclude a zirconium fire, the revised analyses show that it is not feasible, without numerous constraints, to define a

⁹ Gordon Thompson, Hazard Potential of the La Hague Site: An Initial Review (Cambridge, Massachusetts: Institute for Resource and Security Studies, May 2000).

¹⁰ Timothy Collins et al (authors are all from the NRC Staff), Technical Study of Spent Fuel Pool Accident Risk at Decommissioning Nuclear Power Plants, October 2000.

¹¹ Collins et al, October 2000 (op cit), page 2-1.

generic decay heat level (and therefore decay time) beyond which a zirconium fire is not physically possible."

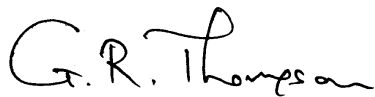
11. On numerous occasions, I have drawn attention in my writings and oral presentations to the vulnerability of nuclear facilities to acts of malice or insanity. I have pointed out that PRAs do not address acts of malice or insanity, with the result that a PRA can, at best, provide a lower bound to the probability of a release of radioactive material.¹² In 1996 I wrote a generic report on war and terrorism as risk factors for nuclear power plants.¹³ Among other findings, this report noted that an act of war or terrorism at a nuclear power plant might have as its primary target the spent fuel stored at the plant, rather than the reactor. The report concluded with a statement that:

"Public debate about the future operation of existing nuclear power plants, and the construction of new plants, should be broadened to encompass the possible involvement of nuclear plants in war or terrorism."

12. I have reviewed the NRC's Waste Confidence Decision Update (73 Fed. Reg. 59,551 (Oct. 9, 2009) and the NRC's proposed rule entitled "Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation" (73 Fed. Reg. 59,547 (Oct. 9, 2009). I am generally familiar with NRC technical studies of accident risks posed by nuclear power plants and their spent fuel, as well as NRC policies and regulations with respect to the protection of nuclear facilities against intentional attack. Also, I am familiar with governing law and guidance, including the National Environmental Policy Act and relevant NRC implementing regulations.

13. I am the author of a report entitled "Environmental Impacts of Storing Spent Nuclear Fuel and High-Level Waste from Commercial Nuclear Reactors: A Critique of NRC's Waste Confidence Decision and Environmental Impact Determination (February 6, 2009).

The facts presented in this declaration and in the report described in paragraph 13 are true and correct to the best of my knowledge, and the opinions expressed in the declaration and report are based on my best professional judgment.



Dr. Gordon R. Thompson

February 6, 200

¹² The strengths and weaknesses of PRA methodology are discussed in Hirsch et al, August 1989 (op cit).

¹³ Gordon Thompson, War, Terrorism and Nuclear Power Plants (Canberra: Peace Research Centre, Australian National University, October 1996).

Curriculum Vitae for Gordon R. Thompson

August 2008

Professional expertise

- Technical and policy analysis in the fields of energy, environment, sustainable development, human security, and international security.

Current appointments

- Executive director, Institute for Resource & Security Studies (IRSS), Cambridge, Massachusetts (since 1984).
- Research Professor, George Perkins Marsh Institute, Clark University, Worcester, Massachusetts (since 2002).

Education

- D.Phil., applied mathematics, Oxford University (Balliol College), 1973.
- B.E., mechanical engineering, Univ. of New South Wales, Sydney, Australia, 1967.
- B.Sc., mathematics & physics, Univ. of New South Wales, 1966.

Project sponsors and tasks (selected)

- Greenpeace Canada, 2007-2008: conducted technical and policy analysis on risk and sustainability issues related to the use of nuclear energy.
- Green Energy Coalition, Pembina Institute, and Ontario Sustainable Energy Association, 2008: prepared testimony for submission to the Ontario Energy Board.
- US Institute of Peace and other sponsors, 2005-2008: co-convened the Working Group on US-Iran Health Science Cooperation.
- World Health Organization, 2006-2007: conducted policy analysis on the potential for "health-bridge" programs to improve cooperation within and between nations.
- Sierra Club of Canada, 2006-2007: prepared a strategy for development of planning and public-engagement tools to facilitate action on climate change.
- Mothers for Peace, California, 2002-2008: analyzed risk issues and prepared expert testimony associated with the Diablo Canyon nuclear power plants.
- Riverkeeper, New York, 2007-2008: analyzed risk issues and prepared expert testimony associated with the Indian Point nuclear power plants.
- Attorney General of Massachusetts, 2006-2008: analyzed risk issues and prepared expert testimony associated with the Pilgrim and Vermont Yankee nuclear power plants.

- Minnesota Center for Environmental Advocacy, and Minnesotans for an Energy Efficient Economy, 2005-2006: conducted technical analysis and provided expert testimony regarding management of spent fuel from the Monticello nuclear power plant.
- California Energy Commission, 2005: conducted technical analysis and participated in an expert workshop regarding safety and security of commercial nuclear facilities.
- Committee on Radioactive Waste Management (a committee appointed by the UK government), 2005: provided expert advice and technical analysis on long-term safety and security of radioactive waste management.
- Legal Resources Centre, Cape Town, South Africa, 2004-2007: conducted technical analysis regarding the proposed South African pebble bed modular nuclear reactor.
- STAR Foundation, New York, 2002-2004: reviewed planning and actions for decommissioning of research reactors at Brookhaven National Laboratory.
- Attorney General of Utah, 2003: conducted technical analysis and provided expert testimony regarding a proposed national storage facility for spent nuclear fuel.
- Citizens Awareness Network, Massachusetts, 2002-2003: conducted analysis on robust storage of spent nuclear fuel.
- Tides Center, California, 2002-2004: conducted analysis for the Santa Susana Field Laboratory (SSFL) Advisory Panel regarding the history of releases of radioactive material from the SSFL.
- Orange County, North Carolina, 1999-2002: assessed risk issues associated with the Harris nuclear power plant, identified risk-reduction options, and prepared expert testimony.
- William and Flora Hewlett Foundation and other sponsors, 1999-2008: performed research and project development for conflict-management projects, through IRSS's International Conflict Management Program.
- STAR Foundation, New York, 2000-2001: assessed risk issues associated with the Millstone nuclear power plant, identified risk-reduction options, and prepared expert testimony.
- Massachusetts Water Resources Authority, 2000: evaluated risks associated with water supply and wastewater systems that serve greater Boston.
- Canadian Senate, Energy & Environment Committee, 2000: reviewed risk issues associated with the Pickering Nuclear Generating Station.
- Greenpeace International, Amsterdam, 2000: reviewed impacts associated with the La Hague nuclear complex in France.
- Government of Ireland, 1998-2001: developed framework for assessment of impacts and alternative options associated with the Sellafield nuclear complex in the UK.
- Clark University, Worcester, Massachusetts, 1998-1999: participated in confidential review of outcomes of a major foundation's grants related to climate change.
- UN High Commissioner for Refugees, 1998: co-developed a strategy for conflict management in the CIS region.
- General Council of County Councils (Ireland), W. Alton Jones Foundation (USA), and Nuclear Free Local Authorities (UK), 1996-2000: assessed environmental and economic issues of nuclear fuel reprocessing in the UK; assessed alternative options.
- Environmental School, Clark University, Worcester, Massachusetts, 1996: session leader at the Summer Institute, "Local Perspectives on a Global Environment".

- Greenpeace Germany, Hamburg, 1995-1996: performed a study on war, terrorism and nuclear power plants.
- HKH Foundation, New York, and Winston Foundation for World Peace, Washington, DC, 1994-1996: studies and workshops on preventive action and its role in US national security planning.
- Carnegie Corporation of New York, Winston Foundation for World Peace, Washington, DC, and others, 1995: collaboration with the Organization for Security and Cooperation in Europe to facilitate improved coordination of activities and exchange of knowledge in the field of conflict management.
- World Bank, 1993-1994: a study on management of data describing the performance of projects funded by the Global Environment Facility (joint project of IRSS and Clark University).
- International Physicians for the Prevention of Nuclear War, 1993-1994: a study on the international control of weapons-usable fissile material.
- Government of Lower Saxony, Hannover, Germany, 1993: analysis of standards for radioactive waste disposal.
- University of Vienna (using funds supplied by the Austrian government), 1992: review of radioactive waste management at the Dukovany nuclear power plant, Czech Republic.
- Sandia National Laboratories, 1992-1993: advice to the US Department of Energy's Office of Foreign Intelligence.
- US Department of Energy and Battelle Pacific Northwest Laboratories, 1991-1992: advice for the Intergovernmental Panel on Climate Change regarding the design of an information system on technologies that can limit greenhouse gas emissions (joint project of IRSS, Clark University and the Center for Strategic and International Studies).
- Winston Foundation for World Peace, Boston, Massachusetts, and other funding sources, 1992-1993: development and publication of recommendations for strengthening the International Atomic Energy Agency.
- MacArthur Foundation, Chicago, Illinois, W. Alton Jones Foundation, Charlottesville, Virginia, and other funding sources, 1984-1993: policy analysis and public education on a "global approach" to arms control and disarmament.
- Energy Research Foundation, Columbia, South Carolina, and Peace Development Fund, Amherst, Massachusetts, 1988-1992: review of the US government's tritium production (for nuclear weapons) and its implications.
- Coalition of Environmental Groups, Toronto, Ontario (using funds supplied by Ontario Hydro under the direction of the Ontario government), 1990-1993: coordination and conduct of analysis and preparation of testimony on accident risk of nuclear power plants.
- Greenpeace International, Amsterdam, Netherlands, 1988-1990: review of probabilistic risk assessment for nuclear power plants.
- Bellerive Foundation, Geneva, Switzerland, 1989-1990: planning for a June 1990 colloquium on disarmament, and editing of proceedings.
- Iler Research Institute, Harrow, Ontario, 1989-1990: analysis of regulatory response to boiling-water reactor accident potential.
- Winston Foundation for World Peace, Boston, Massachusetts, and other funding sources, 1988-1989: analysis of future options for NATO (joint project of IRSS and the Institute for Peace and International Security).

- Nevada Nuclear Waste Project Office, Carson City, Nevada (via Clark University), 1989-1990: analyses of risk aspects of radioactive waste management and disposal.
- Ontario Nuclear Safety Review (conducted by the Ontario government), Toronto, Ontario, 1987: review of safety aspects of CANDU reactors.
- Washington Department of Ecology, Olympia, Washington, 1987: analyses of risk aspects of a proposed radioactive waste repository at Hanford.
- Natural Resources Defense Council, Washington, DC, 1986-1987: preparation of expert testimony on hazards of the Savannah River Plant, South Carolina.
- Lakes Environmental Association, Bridgton, Maine, 1986: analysis of federal regulations for disposal of radioactive waste.
- Greenpeace Germany, Hamburg, 1986: participation in an international study on the hazards of nuclear power plants.
- Three Mile Island Public Health Fund, Philadelphia, Pennsylvania, 1983-1989: studies related to the Three Mile Island nuclear power plant and emergency response planning.
- Attorney General, Commonwealth of Massachusetts, 1984-1989: analyses of the safety of the Seabrook nuclear power plant, and preparation of expert testimony.
- Union of Concerned Scientists, Cambridge, Massachusetts, 1980-1985: studies on energy demand and supply, nuclear arms control, and the safety of nuclear installations.
- Conservation Law Foundation of New England, Boston, Massachusetts, 1985: preparation of expert testimony on cogeneration potential at a Maine paper mill.
- Town & Country Planning Association, London, UK, 1982-1984: coordination and conduct of a study on safety and radioactive waste implications of the proposed Sizewell nuclear power plant, and testimony to the Sizewell Public Inquiry.
- US Environmental Protection Agency, Washington, DC, 1980-1981: assessment of the cleanup of Three Mile Island Unit 2 nuclear power plant.
- Center for Energy & Environmental Studies, Princeton University, Princeton, New Jersey, and Solar Energy Research Institute, Golden, Colorado, 1979-1980: studies on the potentials of renewable energy sources.
- Government of Lower Saxony, Hannover, Federal Republic of Germany, 1978-1979: coordination and conduct of studies on safety and security aspects of the proposed Gorleben nuclear fuel cycle center.

Other experience (selected)

- Principal investigator, project on "Exploring the Role of 'Sustainable Cities' in Preventing Climate Disruption", involving IRSS and three other organizations, 1990-1991.
- Visiting fellow, Peace Research Centre, Australian National University, 1989.
- Principal investigator, Three Mile Island emergency planning study, involving IRSS, Clark University and other partners, 1987-1989.
- Co-leadership (with Paul Walker) of a study group on nuclear weapons proliferation, Institute of Politics, Harvard University, 1981.
- Foundation (with others) of an ecological political movement in Oxford, UK, which contested the 1979 Parliamentary election.

- Conduct of cross-examination and presentation of expert testimony, on behalf of the Political Ecology Research Group, at the 1977 Public Inquiry into proposed expansion of reprocessing capacity at Windscale, UK.
- Conduct of research on plasma theory (while a D.Phil candidate), as an associate staff member, Culham Laboratory, UK Atomic Energy Authority, 1969-1973.
- Service as a design engineer on coal-fired power plants, New South Wales Electricity Commission, Sydney, Australia, 1968.

Publications (selected)

- *Cost Implications of the Residual Radiological Risk of Nuclear Generation of Electricity in Ontario*, a report for the Green Energy Coalition et al, 30 July 2008.
- "The US Effort to Dispose of High-Level Radioactive Waste", *Energy and Environment*, Volume 19, Numbers 3 and 4 (joint issue), 2008, pp 391-412.
- *Design and Siting Criteria for Nuclear Power Plants in the 21st Century*, a report for Greenpeace Canada, Toronto, January 2008.
- *Risk-Related Impacts from Continued Operation of the Indian Point Nuclear Power Plants*, a report for Riverkeeper, Tarrytown, New York, 28 November 2007.
- *Assessing Risks of Potential Malicious Actions at Commercial Nuclear Facilities: The Case of a Proposed Independent Spent Fuel Storage Installation at the Diablo Canyon Site*, a report for San Luis Obispo Mothers for Peace, California, 27 June 2007.
- *Health as a Bridge for Peace: Achievements, Challenges, and Opportunities for Action by WHO* (with Paula Gutlove), a report for the Department for Health Action in Crises, World Health Organization, Geneva, 31 December 2006.
- "Using Psychosocial Healing in Postconflict Reconstruction" (with Paula Gutlove), in Mari Fitzduff and Chris E. Stout (eds), *The Psychology of Resolving Global Conflicts: From War to Peace*, Praeger Security International, 2006.
- "What Role for Nuclear Power in a Sustainable Civilization?", *The Green Cross Optimist*, Spring 2006, pp 28-30.
- *Radiological Risk of Homeport Basing of a Nuclear-Propelled Aircraft Carrier in Yokosuka, Japan*, a report for the Citizens Coalition Concerning the Homeporting of a CVN in Yokosuka, 29 June 2006.
- *Risks and Risk-Reducing Options Associated with Pool Storage of Spent Nuclear Fuel at the Pilgrim and Vermont Yankee Nuclear Power Plants*, a report for the Attorney General, Commonwealth of Massachusetts, 25 May 2006.
- *Reasonably Foreseeable Security Events: Potential threats to options for long-term management of UK radioactive waste*, a report for the UK Committee on Radioactive Waste Management, 2 November 2005.
- "Plasma, policy and progress", *The Australian Mathematical Society Gazette*, Volume 32, Number 3, 2005, pp 162-168.
- "A Psychosocial-Healing Approach to Post-Conflict Reconstruction" (with Paula Gutlove), *Mind & Human Interaction*, Volume 14, Number 1, 2005, pp 35-63.
- "Designing Infrastructure for New Goals and Constraints", Proceedings of the conference, *Working Together: R&D Partnerships in Homeland Security*, Boston, Massachusetts, 27-28 April 2005, sponsored by the US Department of Homeland Security. (A version of this paper has also been published as CRS Discussion Paper

2005-02, Center for Risk and Security, George Perkins Marsh Institute, Clark University, Worcester, Massachusetts.)

- "Potential Radioactive Releases from Commercial Reactors and Spent Fuel", Proceedings of the conference, *Working Together: R&D Partnerships in Homeland Security*, Boston, Massachusetts, 27-28 April 2005, sponsored by the US Department of Homeland Security. (A version of this paper has also been published as CRS Discussion Paper 2005-03, Center for Risk and Security, George Perkins Marsh Institute, Clark University, Worcester, Massachusetts.)
- *Safety of the Proposed South African Pebble Bed Modular Reactor*, a report for the Legal Resources Centre, Cape Town, South Africa, 12 January 2005.
- *Decommissioning of Research Reactors at Brookhaven National Laboratory: Status, Future Options and Hazards*, a report for STAR Foundation, East Hampton, New York, April 2004.
- "Psychosocial Healing and Post-Conflict Social reconstruction in the Former Yugoslavia" (with Paula Gutlove), *Medicine, Conflict and Survival*, Volume 20, Number 2, April-June 2004, pp 136-150.
- "Reducing the Hazards from Stored Spent Power-Reactor Fuel in the United States" (with Robert Alvarez, Jan Beyea, Klaus Janberg, Jungmin Kang, Ed Lyman, Allison Macfarlane and Frank N. von Hippel), *Science and Global Security*, Volume 11, 2003, pp 1-51.
- "Health, Human Security, and Social Reconstruction in Afghanistan" (with Paula Gutlove and Jacob Hale Russell), in John D. Montgomery and Dennis A. Rondinelli (eds), *Beyond Reconstruction in Afghanistan*, Palgrave Macmillan, 2004.
- *Psychosocial Healing: A Guide for Practitioners, based on programs of the Medical Network for Social Reconstruction in the Former Yugoslavia* (with Paula Gutlove), IRSS, Cambridge, Massachusetts and OMEGA Health Care Center, Graz, Austria, May 2003.
- *A Call for Action to Protect the Nation Against Enemy Attack on Nuclear Power Plants and Spent Fuel*, and a Supporting Document, San Luis Obispo Mothers for Peace, California, April 2003 and May 2003.
- "Human Security: Expanding the Scope of Public Health" (with Paula Gutlove), *Medicine, Conflict and Survival*, Volume 19, 2003, pp 17-34.
- *Social Reconstruction in Afghanistan through the Lens of Health and Human Security* (with Paula Gutlove and Jacob Hale Russell), IRSS, Cambridge, Massachusetts, May 2003.
- *Robust Storage of Spent Nuclear Fuel: A Neglected Issue of Homeland Security*, a report for Citizens Awareness Network, Shelburne Falls, Massachusetts, January 2003.
- *Medical Network for Social Reconstruction in the Former Yugoslavia: A Survey of Participants' Views on the Network's Goals and Achievements*, IRSS, Cambridge, Massachusetts, September 2001.
- *The Potential for a Large, Atmospheric Release of Radioactive Material from Spent Fuel Pools at the Harris Nuclear Power Plant: The Case of a Pool Release Initiated by a Severe Reactor Accident*, a report for Orange County, North Carolina, 20 November 2000.
- *A Review of the Accident Risk Posed by the Pickering 'A' Nuclear Generating Station*, a report for the Standing Committee on Energy, Environment and Natural Resources, Canadian Senate, August 2000.

- *High-Level Radioactive Liquid Waste at Sellafield: An Updated Review*, a report for the UK Nuclear Free Local Authorities, June 2000.
- *Hazard Potential of the La Hague Site: An Initial Review*, a report for Greenpeace International, May 2000.
- *A Strategy for Conflict Management: Integrated Action in Theory and Practice* (with Paula Gutlove), IRSS, Cambridge, Massachusetts, March 1999.
- *Risks and Alternative Options Associated with Spent Fuel Storage at the Shearon Harris Nuclear Power Plant*, a report for Orange County, North Carolina, February 1999.
- *High Level Radioactive Liquid Waste at Sellafield: Risks, Alternative Options and Lessons for Policy*, IRSS, Cambridge, Massachusetts, June 1998.
- "Science, democracy and safety: why public accountability matters", in F. Barker (ed), *Management of Radioactive Wastes: Issues for local authorities*, Thomas Telford, London, 1998.
- "Conflict Management and the OSCE" (with Paula Gutlove), *OSCE/ODIHR Bulletin*, Volume 5, Number 3, Fall 1997.
- *Safety of the Storage of Liquid High-Level Waste at Sellafield* (with Peter Taylor), Nuclear Free Local Authorities, UK, November 1996.
- *Assembling Evidence on the Effectiveness of Preventive Actions, their Benefits, and their Costs: A Guide for Preparation of Evidence*, IRSS, Cambridge, Massachusetts, August 1996.
- *War, Terrorism and Nuclear Power Plants*, Peace Research Centre, Australian National University, Canberra, October 1996.
- "The Potential for Cooperation by the OSCE and Non-Governmental Actors on Conflict Management" (with Paula Gutlove), *Helsinki Monitor*, Volume 6 (1995), Number 3.
- "Potential Characteristics of Severe Reactor Accidents at Nuclear Plants", "Monitoring and Modelling Atmospheric Dispersion of Radioactivity Following a Reactor Accident" (with Richard Sclove, Ulrike Fink and Peter Taylor), "Safety Status of Nuclear Reactors and Classification of Emergency Action Levels", and "The Use of Probabilistic Risk Assessment in Emergency Response Planning for Nuclear Power Plant Accidents" (with Robert Goble), in D. Golding, J. X. Kasperson and R. E. Kasperson (eds), *Preparing for Nuclear Power Plant Accidents*, Westview Press, Boulder, Colorado, 1995.
- *A Data Manager for the Global Environment Facility* (with Robert Goble), Environment Department, The World Bank, June 1994.
- *Preventive Diplomacy and National Security* (with Paula Gutlove), Winston Foundation for World Peace, Washington, DC, May 1994.
- *Opportunities for International Control of Weapons-Usable Fissile Material*, International Physicians for the Prevention of Nuclear War, Cambridge, Massachusetts, January 1994.
- "Article III and IAEA Safeguards", in F. Barnaby and P. Ingram (eds), *Strengthening the Non-Proliferation Regime*, Oxford Research Group, Oxford, UK, December 1993.
- *Risk Implications of Potential New Nuclear Plants in Ontario* (prepared with the help of eight consultants), a report for the Coalition of Environmental Groups, Toronto, submitted to the Ontario Environmental Assessment Board, November 1992 (3 volumes).
- *Strengthening the International Atomic Energy Agency*, IRSS, Cambridge, Massachusetts, September 1992.

- *Design of an Information System on Technologies that can Limit Greenhouse Gas Emissions* (with Robert Goble and F. Scott Bush), Center for Strategic and International Studies, Washington, DC, May 1992.
- *Managing Nuclear Accidents: A Model Emergency Response Plan for Power Plants and Communities* (with six other authors), Westview Press, Boulder, CO, 1992.
- "Let's X-out the K" (with Steven C. Sholly), *Bulletin of the Atomic Scientists*, March 1992, pp 14-15.
- "A Worldwide Programme for Controlling Fissile Material", and "A Global Strategy for Nuclear Arms Control", in F. Barnaby (ed), *Plutonium and Security*, Macmillan Press, UK, 1992.
- *No Restart for K Reactor* (with Steven C. Sholly), IRSS, Cambridge, Massachusetts, October 1991.
- *Regulatory Response to the Potential for Reactor Accidents: The Example of Boiling-Water Reactors*, IRSS, Cambridge, Massachusetts, February 1991.
- *Peace by Piece: New Options for International Arms Control and Disarmament*, IRSS, Cambridge, Massachusetts, January 1991.
- *Developing Practical Measures to Prevent Climate Disruption* (with Robert Goble), CENED Research Report No. 6, Clark University, Worcester, Massachusetts, August 1990.
- "Treaty a Useful Relic", *Bulletin of the Atomic Scientists*, July/August 1990, pp 32-33.
- "Practical Steps for the 1990s", in Sadruddin Aga Khan (ed), *Non-Proliferation in a Disarming World*, Proceedings of the Groupe de Bellerive's 6th International Colloquium, Bellerive Foundation, Geneva, Switzerland, 1990.
- *A Global Approach to Controlling Nuclear Weapons*, IRSS, Cambridge, Massachusetts, October 1989.
- *IAEA Safety Targets and Probabilistic Risk Assessment* (with three other authors), Greenpeace International, Amsterdam, August 1989.
- *New Directions for NATO* (with Paul Walker and Pam Solo), published jointly by IRSS and the Institute for Peace and International Security (both of Cambridge, Massachusetts), December 1988.
- "Verifying a Halt to the Nuclear Arms Race", in F. Barnaby (ed), *A Handbook of Verification Procedures*, Macmillan Press, UK, 1990.
- "Verification of a Cutoff in the Production of Fissile Material", in F. Barnaby (ed), *A Handbook of Verification Procedures*, Macmillan Press, UK, 1990.
- "Severe Accident Potential of CANDU Reactors," Consultant's Report in *The Safety of Ontario's Nuclear Power Reactors*, Ontario Nuclear Safety Review, Toronto, February 1988.
- *Nuclear-Free Zones* (edited with David Pitt), Croom Helm Ltd, Beckenham, UK, 1987.
- *Risk Assessment Review For the Socioeconomic Impact Assessment of the Proposed High-Level Nuclear Waste Repository at Hanford Site, Washington* (edited; written with five other authors), prepared for the Washington Department of Ecology, December 1987.
- *The Nuclear Freeze Revisited* (with Andrew Haines), Nuclear Freeze and Arms Control Research Project, Bristol, UK, November 1986. Variants of the same paper have appeared as Working Paper No. 18, Peace Research Centre, Australian National

- University, Canberra, February 1987, and in *ADIU Report*, University of Sussex, Brighton, UK, Jan/Feb 1987, pp 6-9.
- *International Nuclear Reactor Hazard Study* (with fifteen other authors), Greenpeace, Hamburg, Federal Republic of Germany (2 volumes), September 1986.
 - "What happened at Reactor Four" (the Chernobyl reactor accident), *Bulletin of the Atomic Scientists*, August/September 1986, pp 26-31.
 - *The Source Term Debate: A Report by the Union of Concerned Scientists* (with Steven C. Sholly), Union of Concerned Scientists, Cambridge, Massachusetts, January 1986.
 - "Checks on the spread" (a review of three books on nuclear proliferation), *Nature*, 14 November 1985, pp 127-128.
 - Editing of *Perspectives on Proliferation*, August 1985, published by the Proliferation Reform Project, IRSS.
 - "A Turning Point for the NPT ?", *ADIU Report*, University of Sussex, Brighton, UK, Nov/Dec 1984, pp 1-4.
 - "Energy Economics", in J. Dennis (ed), *The Nuclear Almanac*, Addison-Wesley, Reading, Massachusetts, 1984.
 - "The Genesis of Nuclear Power", in J. Tirman (ed), *The Militarization of High Technology*, Ballinger, Cambridge, Massachusetts, 1984.
 - *A Second Chance: New Hampshire's Electricity Future as a Model for the Nation* (with Linzee Weld), Union of Concerned Scientists, Cambridge, Massachusetts, 1983.
 - *Safety and Waste Management Implications of the Sizewell PWR* (prepared with the help of six consultants), a report to the Town & Country Planning Association, London, UK, 1983.
 - *Utility-Scale Electrical Storage in the USA: The Prospects of Pumped Hydro, Compressed Air, and Batteries*, Princeton University report PU/CEES #120, 1981.
 - *The Prospects for Wind and Wave Power in North America*, Princeton University report PU/CEES # 117, 1981.
 - *Hydroelectric Power in the USA: Evolving to Meet New Needs*, Princeton University report PU/CEES # 115, 1981.
 - Editing and part authorship of "Potential Accidents & Their Effects", Chapter III of *Report of the Gorleben International Review*, published in German by the Government of Lower Saxony, FRG, 1979; Chapter III published in English by the Political Ecology Research Group, Oxford, UK.
 - *A Study of the Consequences to the Public of a Severe Accident at a Commercial FBR located at Kalkar, West Germany*, Political Ecology Research Group, 1978.

Expert presentations and testimony (selected)

- Institute of Environmental Studies, University of New South Wales, Sydney, Australia, April 2008: presentation, "Citizen Engagement for Sustainable Society".
- Department of Urban and Regional Planning, Shaheed Beheshti University, Tehran, April 2008: presentation, "Sustainable Cities: Challenges and Opportunities".
- National Academy of Sciences, Washington, DC, January 2008: presentation, "What do interested parties think about the expansion of nuclear energy?"
- Abt Associates, Cambridge, Massachusetts, March 2007: presentation, "Creating Informed Action on Climate Change".

- Universities of Medical Science in Tabriz and Isfahan, Iran, April 2007: presentation, "Healthy Design of the Built Environment".
- Minnesota Public Utilities Commission, 2006: testimony regarding trends, risks and costs associated with management of spent fuel from the Monticello nuclear power plant.
- Presentation, "Are Nuclear Installations Terrorist Targets?", at the conference, *Nuclear Energy: Does it Have a Future?*, Drogheda, County Louth, Ireland, 10-11 March 2005.
- Presentation at the session, "UN Security Council Resolution 1244 and Final Status for Kosovo", at the conference, *Lessons Learned from the Balkan Conflicts*, Boston College, Chestnut Hill, Massachusetts, 16-17 October 2004.
- California Public Utilities Commission, 2004: testimony regarding the nature and cost of potential measures for enhanced defense of the Diablo Canyon nuclear power plant.
- European Parliament, 2003: invited presentation to EP members regarding safety and security issues at the Sellafield nuclear site in the UK, and broader implications.
- US Congress, 2002 and 2003: invited presentations at member-sponsored staff briefings on vulnerabilities of nuclear-power facilities to attack and options for improved defenses.
- Numerous public forums in the USA, 2001-2006: invited presentations to public officials and general audiences regarding vulnerabilities of nuclear-power facilities to attack and options for improved defenses.
- UK Consensus Conference on Radioactive Waste Management, 1999: invited testimony on information and decision-making.
- Joint Committee on Public Enterprise and Transport, Irish Parliament, 1999: invited testimony on nuclear fuel reprocessing and international security.
- UK and Irish Parliaments, 1998: invited presentations to members on risks and alternative options associated with nuclear fuel reprocessing in the UK.
- Center for Russian Environmental Policy, Moscow, 1996: invited presentation at a forum in parallel with the G-7 Nuclear Safety Summit.
- Lacey Township Zoning Board, New Jersey, 1995: testimony regarding radioactive waste management.
- Ontario Court of Justice, Toronto, Ontario, 1993: testimony regarding Canada's Nuclear Liability Act.
- Oxford Research Group, seminar on "The Plutonium Legacy", Rhodes House, Oxford, UK, 1993: invited presentation on nuclear safeguards.
- Defense Nuclear Facilities Safety Board, Washington, DC, 1991: testimony regarding the proposed restart of K-reactor, Savannah River Site.
- Conference to consider amending the Partial Test Ban Treaty, United Nations, New York, 1991: presentation on a global approach to arms control and disarmament.
- US Department of Energy, hearing on draft EIS for new production reactor capacity, Columbia, South Carolina, 1991: testimony on tritium need and implications of tritium production options.
- Society for Risk Analysis, 1990 annual meeting, New Orleans, special session on nuclear emergency planning: presentation on real-time techniques for anticipating emergencies.
- Parliamentarians' Global Action, 11th Annual Parliamentary Forum, United Nations, Geneva, 1990: invited presentation on the potential for multilateral nuclear arms control.
- Advisory Committee on Nuclear Facility Safety, Washington, DC, 1989: testimony on public access to information and on government accountability.

- Peace Research Centre, Australian National University, seminar on "Australia and the Fourth NPT Review Conference", Canberra, 1989: invited presentation regarding a universal nuclear weapons non-proliferation regime.
- Carnegie Endowment for International Peace, Conference on "Nuclear Non-Proliferation and the Role of Private Organizations", Washington, DC, 1989: invited presentation on options for reform of the non-proliferation regime.
- US Department of Energy, EIS scoping hearing, Columbia, South Carolina, 1988: testimony on appropriate scope of an EIS for new production reactor capacity.
- International Physicians for the Prevention of Nuclear War, 6th and 7th Annual Congresses, Koln, FRG, 1986 and Moscow, USSR, 1987: invited presentations on relationships between nuclear power and the threat of nuclear war.
- County Council, Richland County, South Carolina, 1987: testimony on implications of severe reactor accidents at the Savannah River Plant.
- Maine Land Use Regulation Commission, 1985: testimony on cogeneration potential at facilities of Great Northern Paper Company.
- Interfaith Hearings on Nuclear Issues, Toronto, Ontario, 1984: invited presentations on options for Canada's nuclear trade and Canada's involvement in nuclear arms control.
- Sizewell Public Inquiry, UK, 1984: testimony on safety and radioactive waste implications of the proposed Sizewell nuclear power plant.
- New Hampshire Public Utilities Commission, 1983: testimony on electricity demand and supply options for New Hampshire.
- Atomic Safety & Licensing Board, US Nuclear Regulatory Commission, 1983: testimony on use of filtered venting at the Indian Point nuclear power plant.
- US National Advisory Committee on Oceans and Atmosphere, 1982: testimony on implications of ocean disposal of radioactive waste.
- Environmental & Energy Study Conference, US Congress, 1982: invited presentation on implications of radioactive waste management.

Miscellaneous

- Married, two children.
- Extensive experience in public speaking and interviews by representatives of print and electronic media.
- Author of numerous essays and letters in newspapers and magazines.

Contact information

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