

**Rulemaking Comments**

**PRM-72-6  
(74FR09178)**

19

**From:** Site Administrator [action@ucsusa.org] on behalf of Geoffrey Cook  
[geoffrey.cook@sbcglobal.net]  
**Sent:** Friday, May 15, 2009 12:35 AM  
**To:** Rulemaking Comments  
**Subject:** Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)

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USNRC

May 14, 2009

June 18, 2009 (2:29pm)

Nuclear Regulatory Commissioners

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Dear Commissioners,

I am writing to encourage the NRC to take steps to increase the security and safety of nuclear waste stored at civilian nuclear reactor sites, which remains unacceptably vulnerable to a terrorist attack or accident.

More specifically, I urge you to support a rule change that would strengthen the protection of nuclear waste stored in dry casks against foreseeable threats, such as sophisticated terrorist attacks, which might emerge over the next several decades. Please accept provision

(11) of the rulemaking petition submitted by the C-10 Research and Education Foundation, which outlines this change.

Those upgrades could include a combination of physical measures, such as putting spent fuel casks into enclosed buildings, using earthen

embankments or other barriers, and other measures such as insuring that intruders will be denied access to independent spent fuel storage installations.

In addition, the current practice of allowing the rods to be stored in wet pools where they are densely packed together poses a dangerous

security risk. In the absence of a place to permanently store the waste underground, the NRC should require plants to promptly transfer spent

fuel from the pools to dry casks as soon as the fuel has cooled enough.

This would reduce the likelihood of a spent fuel fire due to accident or terrorist attack and the amount of radioactive material that could be released by such a fire.

P.s. Below is an article I have written on Dr. Steven Cohen, the leading American expert on Pakistan's nuclear program:

India, Pakistan and Kashmir in the Twenty-First Century A Conversation with Steve Cohen Berkeley Stephen P. Cohen, a Senior Fellow on South Asia at the Brookings Institute especially in Muslim Affairs, and is one of the three foremost American authorities on nuclear proliferation and security in

Southern Asia. His most recent book is The Idea of Pakistan.

Last week I wrote a rather longish piece for these pages on current crisis in Pakistan centered on the personality of Ayesha Siddiqia wherein I mentioned the communality with three interviews I had done

for other publications previously with Steve Cohen. Thus, I decided to bring the vision between Cohen and Ayesha over Karachi.

Although both the Doctors Cohen and Siddiqia are experts on the

Pakistani Armed Forces, they each take different aspects of it to share with their scholarly public: Ayesha, the Sociology and Cohen, the Strategy. Speaking on the "enduring" Kashmir crisis, he was not too hopeful that

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the encouraging words coming out of New Delhi and Islamabad would mean much in the long run. "Kashmir was once a Heaven on Earth; then, it became a Hell; now it is a threat to the future of

the whole world." (I disagree with him that there has been no progress made, though.) Traditionally, the United States has had little involvement in the crisis, but China has been deeply involved because they hold a heavy slice of Kashmiri territory. Thus, Beijing is an "illegal" partner in the equation. Recently, however, China has been migrating toward the position that India and Pakistan must untangle the ongoing crisis amongst them, for "the mess has become a platform for nuclear war!"

Therefore, it has become an international issue.

As a result, it has developed into a "race between [mega] death and resolution ... Kashmir has [finally] joined the roster of international issues!" Nuclearization has imported the latent possibility of igniting the next World War ("the War of the Jihad?").

India's position is that that the imbroglio must be settled bilaterally. Consequently, "Pakistan has been upset over the Indian

process [in previous talks], and has been dissatisfied over the lack of substance" therein. Still, although it would be possible in conventional warfare, Pakistan would hit back hard with its nuclear resources if its territory was breached, and, hence, "It would be

impossible to [militarily] to defeat Rawalpindi." For that reason, the nightmare has made the simmering situation a prospect for American mediation although the Indian position would have to shift for that to be allowed to happen.

Most importantly, though, "There is a need for dialogues that involve the Kashmiris" themselves.

The big quandary lies within the Vale, although India would prefer accepting the LoC (the Line of Control) as the international boundary,

Pakistan is totally against that. As a settlement, nevertheless, Steve feels that Islamabad might accept better human rights and a mechanism to guarantee them for the Kashmiris rather than to obtain hard terrain.

All the three parties plus potential parties -- such as the United States -- must exert their political will to push down hard upon the challenge. Failure is unimaginable!

Regarding the Islamic warriors' internationalization of the struggle in the provinces, Cohen noted that "It is a place to find your manhood if you're a [radical] jihadi!"

Although there have been enlightened steps taken by the two southern Asian leaders recently, yet both the former Prime Minister (India) and the President (Pakistan) have made contradicting comments to assuage their Right-wings, and, in both the competing nuclear nations, each have reactionary elements that are in a position to take the helms of Government under a potentially degenerating political situation that could arise. (Please, refer to my article of last week wherein we are in the midst such a crisis within the Islamic Republic!). In the past India has been able to take the initial steps, but have been unable to follow through upon their previous commitments. Previously, if a Kashmiri settlements were achieved leading to independence for the states (Azad Kashmir is part of the question of settlement), New Delhi fears American dominance in the region. Now, further, the fear of Islamic extremists is much closer to the heartland of Bharat!

From the Pakistani side it is more of a strategic consideration.

With the current status quo, Islamabad holds down 500,000 of India's

military and paramilitary forces. If political consensus were achieved over the disputed provinces, those forces could be deployed to other areas of the frontier. Professor Cohen demonstrated that was a facetious consideration in a post-nuclear era. In that, any conventional army that would breach either boundary would be obliterated.

Dr. Stephen Cohen ended our conversation with an ominous question, though: "Is time on our side?"

Sincerely,

Dr. Geoffrey Cook  
PO Box 4233  
Berkeley, CA 94704-0233