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PRM-72-6  
(74FR09178)

**Comments, Rulemaking**

**From:** Site Administrator [action@ucsusa.org] on behalf of G.P. Franck-Weiby  
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**Sent:** Friday, May 15, 2009 2:59 PM  
**To:** Rulemaking Comments  
**Subject:** Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)

DOCKETED  
USNRC

May 15, 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.

As the consequences of the past century of energy policy compel us to re-evaluate the roles of various forms and sources of energy, we must be able to make clear judgements of the total costs of each option.

The costs of preparing for low-probability/ extreme consequence risks

that regulation is not requiring nuclear generator operators to incur - along with federal guarantees, instead of private insurance, committed

to pay for the consequences of these risks are costs concealed by being

externalized, misrepresenting the total costs that must be measured for any meaningful judgement about which technologies to develop and which

to abandon. Personally, I believe that the costs of nuclear generation exceed the benefits, but there's no way to tell until we can measure all of the costs.

Sincerely,

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