

**Rulemaking Comments**

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

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**From:** Site Administrator [action@ucsusa.org] on behalf of Robert Mihaly [gumbohead47@yahoo.com]  
**Sent:** Friday, May 15, 2009 8:00 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.

Where I live along the Lake Erie shore, I am in the middle between two nuclear facilities operated by the utility, First Energy, that was responsible for the incident where lax inspections resulted in a

football-sized hole being found in the lid of the containment vessel at the last moment before it breached. If an accident happened at one plant, northeasterly winds could bring contamination to me, and if the other plant had an accident, the prevailing winds from the west would

reach me. Should I trust them to safely store their nuclear waste? This is the same utility whose lax tree-trimming practices caused the Great Blackout of 2003. I have no faith whatsoever in their capabilities...nor should anyone. We need a safer way to store spent fuel than what is currently in practice.

Sincerely,

Mr. Robert Mihaly  
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