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PRM-72-6
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Rulemaking Comments

From: Site Administrator [action@ucsusa.org] on behalf of Robert Seidel [rws@tc.umn.edu]
Sent: Saturday, May 16, 2009 4:03 AM
To: Rulemaking Comments
Subject: Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)

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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. The failure of the Atomic Energy Commission, Energy Research and Development Agency, the Nuclear Regulatory Commission, and the Department of Energy, compounded by congressional action restricting siting of high-level nuclear wastes, has made this the most pressing

problem facing the nuclear power industry and NRC. The unavailability of the Yucca Mountain facility for the foreseeable future exacerbates the problem, and I think there is at least a possible interim solution that will reduce the nuclear danger.

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 a retired employee of the University of California at the Los Alamos

National Laboratory, I have followed this problem for many years. Now,

more than ever, it is clear that the public safety of the nation can no

longer be left to industrial economics, and that the Price-Anderson Act is no longer adequate to cover the potential loss to the nation. I urge you to take action on this matter.

Sincerely,

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