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Rulemaking Comments

From: Site Administrator [action@ucsusa.org] on behalf of Coralie Carraway
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Sent: Saturday, May 16, 2009 4:23 AM
To: Rulemaking Comments
Subject: Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)

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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. If the Bush administration had really been serious about decreasing

the threat of terrorism in this country, it would have started with the no-brainers, like securing our nuclear production, transport and

storage mechanisms. I live in southeast Florida, where the presence of the Turkey Point facility nuclear facility casts a heavy shadow over the otherwise idyllic landscape. Besides the constant fear of inadequate regulatory processes in everyday production, there is the chronic fear of accidents, or worse, potential terrorism threats relating to the transport of nuclear waste via largely unsecured

mechanisms and the lack of sufficient storage procedures once the waste arrives at its disposal destinations. This whole effort needs

re-vamping from beginning to end. However, a good place to start would be at the most vulnerable point, containment of the nuclear waste.

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.

I further suggest that a blue ribbon panel of scientists be appointed as a standing advisory committee to the President on nuclear matters relating to all aspects of the production and disposal on nuclear material. This

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panel should serve as an oversight and quality control assurance body, suggesting and overseeing adequate safety measures at every stage. This committee should be also be advisory to the Dept. of

Defense, the Secretaries of State. Interior and Commerce and Health and Human Services, and Homeland Security. It should as well serve as our

international liaison with like-minded panels from countries around the world.

Homeland Security is a farce when major vulnerabilities such as securing our nuclear production, use and disposal are left largely unaddressed.

Sincerely,

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