From: Site Administrator on behalf of Daniel Brady
To: Rulemaking Comments
Subject: Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)
Date: Friday, May 15, 2009 1:25:29 PM

May 15, 2009

Nuclear Regulatory Commissioners

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.

Nuclear waste is not forever, but it may as well be. The half life of some of these materials are measured in thousands of centuries. It is dangerous stuff and we cannot now guarantee that those generations of

the future will be kept out of harms way. No nation currently existing has lasted even a slight fraction of the time it would take for the materials to become safe. We need a better solution that what is currently being done, better, even, than the suggestion that follows. History is unkind to those who leave waste and poison as a legacy. What are you going to do ?
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.

Sincerely,

Mr. Daniel Brady
138 University St
San Francisco, CA 94134-1302