From:	Site Administrator on behalf of David Buesch
To:	Rulemaking Comments
Subject:	Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)
Date:	Friday, May 15, 2009 9:36:58 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.

For many years I have been concerned about the safety of nuclear waste that is being stored at civilian reactor sites because of the numerous

reports on the vulnerability from potential system failures and attacks by intruders. 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. For more than 35 years, I have agreed with the premise that if we as a country are to use nuclear power, then an underground geologic repository is the most responsible long-term solution to nuclear waste. However, with the recent change in policy by the DOE, and 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 write to you as a concerned citizen, and one who has followed the

investigations and evaluations of independent organizations such as the Union of Concerned Scientists. Working to protect the public, especially regarding nuclear waste, must be a critical effort of the power companies, regulators, and government as a whole.
Thank you for your consideration.

Sincerely,

Dr. David Buesch

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