From:	Site Administrator on behalf of Gail Camhi
To:	Rulemaking Comments
Subject:	Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)
Date:	Friday, May 15, 2009 5:21:44 AM

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.
I urge you to support a rule change to strengthen protections of nuclear waste stored in dry casks against foreseeable threats like sophisticated terrorist attacks, which may well emerge over the next few 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.

More, the current practice of permitting rods to be stored in wet pools

where they are densely packed, poses a dangerous security risk. Absence a place to permanently store waste underground, the NRC should require plants to promptly transfer spent fuel from pools to dry casks as soon

as the fuel has cooled. This will 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,

Ms. Gail Camhi
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