From:	Site Administrator on behalf of Jeannie Gibbons
To:	Rulemaking Comments
Subject:	Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)
Date:	Saturday, May 16, 2009 4:56:18 PM

May 16, 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.
Specifically, I urge you to support a rule change which 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 rule-making petition submitted by the C-10 Research and Education Foundation, which outlines the 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 ensuring that intruders are 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 which could be released by such a fire.

Sincerely,

Ms. Jeannie Gibbons
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