From:	Site Administrator on behalf of John Titus
To:	Rulemaking Comments
Subject:	Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)
Date:	Saturday, May 16, 2009 6:43:04 AM

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.
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.
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.
It is well-recognized that fire protection and physical security concerns will remain paramount no matter how the spent fuel is

configured and stored. Detailed assessments of the hazards and relative risks of different choices should be available to help make informed

decisions. Given the potential severity of an untoward incident and the very long period of time we will all have to face this issue, it is imperative that our decision-making be informed and guided by the best and broadest base of knowledge and technologies.

Sincerely,

Mr. John Titus
14 Hunter Cir
Jefferson, MA 01522-1420