From: Site Administrator on behalf of marcelo lippmann
To: Rulemaking Comments
Subject: Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)
Date: Friday, May 15, 2009 10:36:49 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.
To be more specific, I am asking you to support a rule change that would strengthen the protection of nuclear waste stored in dry casks against foreseeable threats, as for example sophisticated terrorist attacks, which might emerge in the near or far future. I urge you to

accept provision (11) of the rule-making petition submitted by the C-10 Research and Education Foundation, which outlines this change.
What is being proposed could include a combination of physical

measures, such as placing the 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 also poses a dangerous security risk. If there is no site where 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. marcelo lippmann
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