From: Site Administrator on behalf of Victoria Vernon
To: Rulemaking Comments
Subject: Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)
Date: Saturday, May 16, 2009 9:23:16 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.

Certainly responsible oversight would suggest more careful monitoring. 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. This would be a sound first step in protecting those you serve.

We need to maintain a level of defense that will reduce the current and the easily foreseeable future hazards. Necessary 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. These are easily instituted safeguards.

Further steps in a program of defense would change 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.

Sincerely,

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