From:	Site Administrator on behalf of KIrsten DeVere
To:	Rulemaking Comments
Subject:	Docket # PRM 72-6 (Reduce Vulnerability of Stored Nuclear Waste)
Date:	Thursday, May 14, 2009 4:48:38 PM

May 14, 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.

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 that could be released by such a fire.
Also, I think that the category of "spent" needs to be reexamined. These rods are spent for the purposes they were

manufatured for. But what of other purposes? Is there not some way to use the remaining energy in these rods so that they are completely drained of all harmful radiation, etc? I wonder is there couldn't be energy generated in "devolving" these rods into harmless components.l

Sincerely,

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