

**From:** Diane Curran <dcurran@harmoncurran.com>  
**Sent:** Wednesday, October 09, 2013 4:48 PM  
**To:** Brown, Christopher  
**Cc:** Gordon Thompson (gthompson@irss-usa.org)  
**Subject:** Please forward message  
**Attachments:** Thompson Comments on Consequence Study 8-1-13.pdf; 20130718-ucs-nrc-draft-spent-fuel-pool-study.pdf; ACRS Letter 13 April 2000.pdf

Christopher, thanks for agreeing to forward this message to Dr. Powers. Diane

Dear Dr. Powers:

I am writing to follow up on the October 2 ACRS meeting regarding the NRC Staff's Spent Fuel Pool Study and Expedited Transfer of Spent Fuel to Dry Cask Storage. First, I want to express my appreciation for your past insistence on scientific rigor and openness in the evaluation of spent fuel storage risks. Thanks to your leadership, after decades of denial, the NRC now acknowledges the risk of catastrophic fires in high-density spent fuel storage pools. We are very concerned, however, that the NRC is poised to bury this very serious health and environmental issue again, based on the NRC Staff's extremely inadequate Spent Fuel Pool Study and older studies that have now been discredited.

Therefore, I am writing to ask you to exercise your leadership again, and support the request in my October 3 letter that the ACRS re-open its review of the draft Spent Fuel Pool Study and the overall adequacy of the NRC Staff's basis for recommending against expedited transfer of spent fuel from high-density storage pools. As demonstrated in technical analyses by Dr. Gordon Thompson and David Lochbaum (attached), the NRC Staff has fallen short of justifying its recommendation that re-racking of pools and use of dry storage for excess fuel is unwarranted. In addition to Dr. Thompson's and Mr. Lochbaum's criticisms, it also appears that serious concerns you raised in 2000 about spent fuel storage risks have not been resolved. (Your 2000 letter is also attached.) As you did in 2000, the ACRS should take time to entertain presentations from outside experts and ensure that all significant criticisms have been addressed.

If the concerns you expressed in 2000 are now resolved, we would like to understand what has changed your view. And in any event, we would like to discuss our general concerns with you. Could we arrange a meeting or a telephone call?

Thank you very much for your consideration.

Sincerely,  
/s/  
Diane Curran

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