

# UNWMSG

Utility Nuclear Waste Management Group

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October 12, 1982

### MEMBERS

- Alabama Power Company
- Arizona Public Service Company
- Baltimore Gas & Electric Company
- Boston Edison Company
- Carolina Power & Light Company
- The Cincinnati Gas & Electric Company
- The Cleveland Electric Illuminating Company
- Commonwealth Edison Company
- Consolidated Edison Co. of New York, Inc.
- The Detroit Edison Company
- Duke Power Company
- Duquesne Light Company
- Florida Power Corporation
- Florida Power & Light Company
- Georgia Power Company
- Gulf States Utilities Company
- Houston Lighting & Power Company
- Illinois Power Company
- Iowa Electric Light & Power Company
- Long Island Lighting Company
- Los Angeles, Department of Water & Power
- Middle South Services, Inc.
- Nebraska Public Power District
- Niagara Mohawk Power Corporation
- Northeast Utilities
- Northern States Power Company
- Pennsylvania Power & Light Company
- Philadelphia Electric Company
- Portland General Electric Company
- Power Authority of the State of New York
- Public Service Electric & Gas Company
- Public Service Indiana
- Sacramento Municipal Utility District
- SNUPPS
- Union Electric Company
- Kansas Gas & Electric Company
- Kansas City Power & Light Company
- Southern California Edison Company
- Texas Utilities Company
- Toledo Edison Company
- Virginia Electric & Power Company
- Wisconsin Public Service Corporation
- Wisconsin Electric Power Company
- Yankee Atomic Electric Company

Mr. Robert E. Browning  
 Division of Nuclear Materials  
 Safety and Safeguards  
 U.S. Nuclear Regulatory Commission  
 Washington, D.C. 20555

Dear Mr. Browning:

Confirming my conversation with Tim Johnson, we would like to meet with you and your staff on November 8, 1982 at our office at 1111 19th Street, N.W. Conference room # 4 on the 3th floor has been reserved from 10:00 a.m. to 3:00 p.m. for this meeting.

The planned agenda includes progress reports on:

- AIF/NSA Program
- NRC/SAI Program
- EPRI/EDS Program
- Plant visits by NRC staff
- Status of Part 61
- Other developments of interest

Sincerely,

*Darinda Jones*  
 for R. E. L. Stanford  
 Program Manager

RELS/dj

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 PDR WASTE  
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July 26, 1982

Proposed Criteria for  
Away-From-Reactor Storage  
by the Department of Energy  
of Commercially-Generated Spent Fuel

The criteria to be used in a determination of the availability of away-from-reactor ("AFR") storage of spent nuclear fuel by the Department of Energy ("DOE") must begin with the premise that assured continued operation of nuclear powerplants is a Federal goal. The Senate clearly voiced this sentiment, stating that nuclear energy, as an integral part of an adequate national electrical system, "is vital to national security and public welfare." S. 1662, §101(a). Thus, the continued operation of a nuclear powerplant should be the principal concern in any determination regarding the availability of DOE AFR spent fuel storage.

Consistent with, and indeed crucial to, this aim is the maintenance of full core reserve capacity in existing on-site spent fuel pools. The ability to temporarily remove a reactor's core is needed to ensure the maintenance and inspection capability necessary to reliable plant operations.

DOE AFR capacity should be allocated to those powerplants which have expanded their existing storage facilities to the maximum practical extent. Criteria which should be considered in a determination of "maximum practical extent" include the following:

A. FEASIBILITY OF EXPANSION OF ON-SITE STORAGE

1. Technical. A utility must not be forced to consider technologies for the storage of spent fuel which are untested and not realistically assured of timely successful development.

2. Legal. Nor must a utility be required to consider alternatives to DOE AFR storage that are subject to legal challenge as in violation of existing federal, state or local law. (For example, transshipment of spent fuel to another plant on a utility's system where such transshipment would be held to be violation of a state law or county ordinance.)

3. Timing. Any decision regarding the availability of DOE AFR storage must further take into consideration the time which is realistically required both to obtain regulatory approval of the on-site storage alternative, and physically to carry out this alternative. Such a time frame must take into account the inevitable delay brought about by political and attendant legal disputes which often arise in the spent fuel storage context.

Thus, a utility should not be required to consider alternative storage methods which cannot be realistically approved and constructed prior to the loss of full core reserve. If additional on-site capacity is not feasible for any of the aforementioned reasons, DOE AFR capacity should be provided.

## B. ECONOMIC FACTORS

Consumer Costs. Even if additional on-site capacity is possible, the economics of providing such capacity must be examined. Consumers of nuclear-generated power will bear the costs of interim storage through increased rates. Thus, the relative economic impact on consumers of storage options must be taken into account. Given a range of feasible storage options, consumers should not be forced to accept a significantly more costly alternative simply because it involves no DOE AFR storage.

## C. PUBLIC HEALTH, SAFETY AND THE ENVIRONMENT.

Finally, any decision must be consistent with ensuring the public health and safety and take into account any impacts on the environment.