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Centralized Interim Storage Statement – Dr. James Conca

I strongly support the proposed Consolidated Interim Storage Facility (CISF) for spent nuclear fuel in Lea County, New Mexico and consider the NRC EIS to be robust and acceptable.

I'm a nuclear and environmental scientist who has worked with nuclear waste in all capacities for 35 years including 25 years on Yucca Mt, 10 years at WIPP, 15 years on Hanford, and many years on most international high-level waste programs. I was Director of the NMSU Environmental Monitoring Center in Carlsbad.

There is no question, scientifically, that dry cask storage in one spot is the safest configuration to put spent fuel into while we wait for a final repository.

The increasing rigor of NRC regulations over the last 40 years has resulted in nuclear waste disposal, or just storage, being the safest endeavor that anyone can participate in, safer than any other activity anyone engages in anywhere.

I understand the concern that people have since decades of science fiction and anti-nuclear rhetoric has elevated this issue to mythological heights. But the robustness of these casks, the safety and ease with which we have moved nuclear waste and nuclear materials millions of miles on roadways and railways around the country with no problems, and the relatively tiny volume of nuclear waste that exists – these are why dry cask storage and nuclear waste disposal is safer than any other activity in American history.

No one has died in the United States handling nuclear waste, no one has even been harmed. Spent fuel is not an operating reactor, it can't melt down or explode, it doesn't have enough energy or high temperatures. And the temperature and energy of the waste steadily go down every year - it gets safer every year.

And volume is important. When I say that the present total nuclear waste of 80,000 tons is a tiny volume of nuclear waste, that's because the physical density of nuclear fuel is almost 9, so 10 tons of spent nuclear fuel would fit in my bathroom. 80,000 tons wouldn't fill half a soccer field. A hundred years from now, the total volume of nuclear waste will still be trivial, still not requiring more than 1 repository or one storage site.

The canister and casks, thicker-walled than most others, are designed so that even unlikely scenarios won't compromise the system. And if something does occur during dry cask storage, the spent fuel can be put in a new cask. It's not that difficult.

In addition, this waste can be re-used in some of the new reactor designs, like the one Bill Gates is building in WA State, which would get 10 times the amount energy from the same waste. So storing it until that is available makes sense. The lack of a final repository doesn't negate the need to store this material safely, in one spot, until we have one.

Risk analysis has evolved to the point where we understand relative risks quite well. The risk from this storage system is so low that it's not statistically different than zero. We can't measure actual risks this small, they are swamped by all other risks of everyday life.

So I understand the concern, but it shouldn't rise to the level of fear. And shouldn't stop the best path forward for our nuclear waste program.

Thank you for this opportunity to speak with you.

Jim Conca

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