



BRC Draft Report: Yakama Nation ERWM Program Comments by IEER

Comments on the July 29, 2011, *Draft Report to the Secretary of Energy, of the Blue Ribbon Commission on America's Nuclear Future (BRC)*

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behalf of the Yakama Nation**

Environmental Restoration Waste Management (ERWM) Program

Submitted to the BRC on October 11, 2011

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Main recommendations for changes/additions to the Draft Report

The final report should

- Recommend abandonment of the co-mingling policy for commercial spent nuclear fuel and defense high-level waste.
- Recommend a dedicated repository for defense high-level waste as well as a number of other kinds of waste like GTCC and GTCC-like waste, reactor graphite blocks, and [depleted uranium](#) from enrichment plants that would cause severe environmental harm if disposed of in shallow land burial but that do not have a high thermal [source term](#) that is characteristic of spent nuclear fuel.
- Look more closely at the ways in which the Nuclear Regulatory Commission is using the process for revising waste classification to relax radiation protection regulations and whether is it doing sound science in the process.
- Recommend that safety and radiation protection standards in the future be at least as protective as those for the present generation, including drinking water standards and EPA's 40 CFR 190 as presently written.
- Recommend radiation protection standards take into account tribal life and culture and follow Executive Order 13045 on the protection of children from environmental risks.
- Include a period of exclusively science-based work prior to any consent-based and science-based siting process.
- Include a provision for stopping characterization after site selection should there be sufficient data that a site is unsuitable (as there was at Hanford as early as 1983).
- Make the recommendation for a tribal role in standard setting that is stronger and broader and include a recommendation that a revised Nuclear Waste Policy Act (NWPA) allow for stricter state, tribal, and local safety standards if they give their consent for characterization.
- Recommend dry Hardened On-Site Storage of spent fuel aged more than five years and low density storage in pools of the rest. This should be independent of whether a consolidated storage facility is recommended or not.
- Explicitly exclude the DOE from the siting process for a consolidated storage facility, if such a facility continues to be recommended, and also exclude DOE sites as consolidated storage sites.
- Recommend direct disposal, without [reprocessing](#), of spent fuel from U.S. light water reactors.



Published on 2011-10-11

Last modified on 2012-05-08