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**Comments for the Blue Ribbon Commission on America's Nuclear Future
Transportation & Storage Subcommittee Public Meeting in Wiscasset, Maine**

By Lisa Ledwidge, Outreach Director, Institute for Energy and Environmental Research (IEER)

August 10, 2010

We understand that your subcommittee has been asked by the Co-chairs of the Blue Ribbon Commission to answer "[s]hould the US change the way in which it is storing used nuclear fuel and high level waste while one or more final disposal locations are established?"¹

Let us state at the outset that IEER supports a scientifically sound deep geological disposal program (emphasis on the term "scientifically sound") as the least damaging choice for long-term spent fuel and high-level waste management. This is a position we have taken after a great deal and many years of research on the subject.

IEER helped draft and is a signatory to the statement, "Principles for Safeguarding Nuclear Waste at Reactors,"² which has been endorsed by more than 170 groups in 50 states. The 6 point statement calls for specific steps to protect the public from the immediate threats posed by the currently vulnerable storage of commercial spent fuel. The statement recommends temporary hardened on-site storage to improve security at nuclear reactor facilities. It has already been recommended to you in public comment and in testimony before you. It would be useful to have an indication of the Subcommittee's thinking on these principles as you proceed and we would appreciate a time frame as to when you might actually consider these principles. A detailed Subcommittee discussion of this topic would have been particularly welcome at this meeting, since the prospect of the security of long-term storage at a closed reactor sites looms as a large one. Perhaps that is on the agenda of your August 19th meeting.

Apart from the general approach in those principles, IEER believes that a closed reactor might be the best place at which the principles for Hardened on Site Storage might first be implemented, provided state and local governments assent to such an approach. Money from the Nuclear Waste Fund should be used for building HOSS facilities, since the federal government failed so badly in keeping its commitments regarding removing spent fuel from

¹ Federal Register: June 28, 2010 (Volume 75, Number 123). Notices. Page 36647-36648. Online at <http://edocket.access.gpo.gov/2010/2010-15593.htm>.

² Principles for Safeguarding Nuclear Waste at Reactors: http://brc.gov/e-mails/May10/HOSS_PRINCIPLES_3_23_2010x.pdf

reactor sites – a problem that will continue for decades. The public is getting no more benefit from the Maine Yankee power plant, but as a result of the failure of the federal government, the public is stuck with the liability even though ratepayers paid to have that taken care of. The least the federal government could do in such a situation is to ensure that the waste is stored in the most secure way possible and that the ratepayer funds are used for this purpose.

I should note here that principles call for funds to be provided to state and local government to monitor hardened on site storage.

Thank you for your time and for taking and posting public comment on your website. But these comments will only be meaningful if the public can begin to have some sense through listening to your open deliberations how you are going to take them into account. We look forward to your discussions on the topic of hardened on site storage in the near future.

In light of the previous remarks at this meeting about reprocessing, my final request is to urge you to think critically about reprocessing. Besides proliferations concerns, which should not be underestimated, reprocessing does not obviate the need for a repository. According to the Department of Energy's GNEP DEIS, reprocessing actually increases the volume of waste to be disposed in a repository by six times more than that of direct disposal of spent fuel.³

Thank you.

³ Table 4.8-6 (p. 4-139) in *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement*. GNEP PEIS. DOE/EIS-0396. October 2008. http://nuclear.gov/peis/Draft_PEIS/GNEP_PEIS.pdf.