

# Initial Comments on the Draft Report

Blue Ribbon Commission on  
America's Nuclear Future  
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# Reality

- “The United States has traveled nearly 25 years down the current path only to come to a point where continuing to rely on the same approach seems destined to bring further controversy, litigation, and protracted delay.” (p. iii).

# The Draft Report omits current DOE disposal siting efforts

- In February 2011 DOE proposes “Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-like Waste”
- Substantial state and public opposition
- Further undermines trust and confidence
- Belated DOE decision to delay the GTCC process until after the Commission final report.

# Further reality and omission

- Actions of some nuclear utilities also have engendered lack of public trust and confidence because of promoting off-site consolidated storage:

Since 2006, Private Fuel Storage has a licensed ISFSI in Utah that is not used.

Some utilities also tried to create consolidated storage on the Mescalero Reservation in New Mexico.

# Draft report omits two important “consent-based” disposal facilities

- Fernald in OH
- Rocky Flats in CO
- Why did communities and state governments consent to:
  - losing thousands of well-paying jobs,
  - allowing about 80% of uranium waste (Fernald) and substantial plutonium waste (Rocky Flats) to be disposed at those sites, and
  - foregoing economic development opportunities?

# Draft report omits addressing why consent has not occurred around U.S. Nuclear Plants

- Why have utilities and nearby communities not volunteered for CIS facilities?
- Why have utilities and nearby communities not volunteered for disposal facilities?
- What role has the promise of off-site storage and disposal played in obtaining “consent” for siting nuclear power plants?
- Should new nuclear plants provide adequate on-site spent fuel storage for all of the SNF that will be generated during their operating lifetime?

# Draft report omits Western reality

- Majority of uranium mining and milling facilities
  - Nuclear weapons testing in Nevada and New Mexico
  - Nuclear weapons sites in CA, CO, ID, NV, NM, WA
  - People in the West have borne a disproportionate burden of the nuclear legacy of waste; contamination of air, water, and soil; and multi-generational health effects
- AND
- Proposed federal disposal sites (NV, TX, WA) in West
  - Utility CIS sites (NM, UT) on tribal lands in West

# Draft report omits Questions from the West (and Answers)

- Why do those with the jobs, electricity, and profits from nuclear power want to transport, store, and dispose SNF in the West?
- Why are those with the most experience in managing spent fuel unwilling to take the risks of long-term storage and disposal?
- What are the technical reasons that long-term storage facilities cannot be sited in the East?
- What are the technical reasons that suitable geologic disposal sites cannot be found in the East?

# Building Trust and Confidence

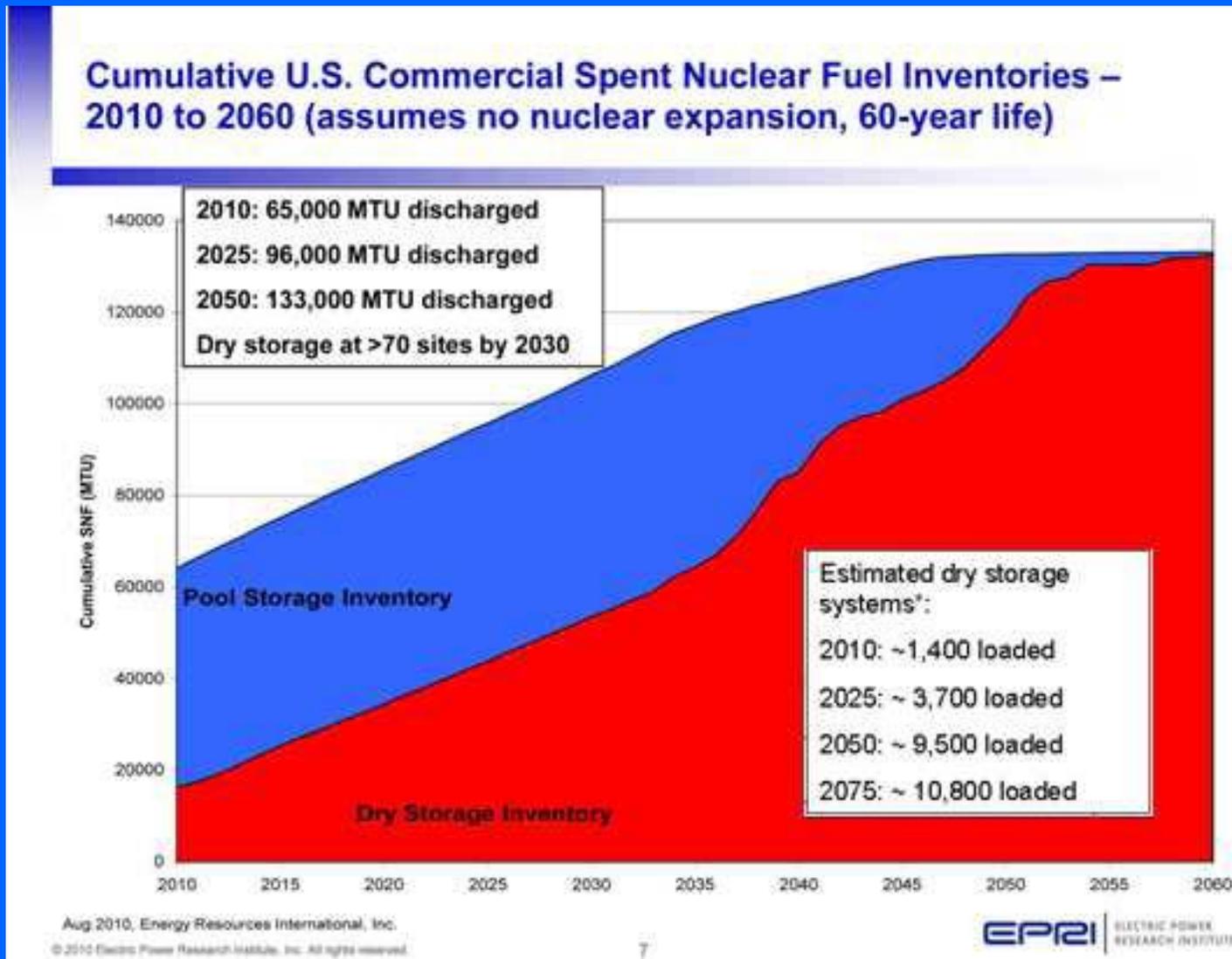
## Recommendations for final report

- Building trust and confidence in the federal government and nuclear utilities is essential for the nation's nuclear waste program.
- Additional investigation is needed about U.S. “consent-based” nuclear waste disposal sites, including Fernald and Rocky Flats.
- Additional investigation is needed about whether a “consent-based” approach could result in long-term storage and disposal facilities at or near U.S. nuclear power plants.

# Reality of Long-Term On-Site Storage

- “Simply put, it will take years to more than a decade to open one or more consolidated storage facilities and even longer to open one or more permanent disposal facilities. This means that interim storage of substantial quantities of spent fuel at operating reactor sites can be expected to continue for some time.” (p. 49).

# Reality of additional spent fuel



# Additional reality omitted

- New nuclear plants will further increase the amount of spent nuclear fuel in on-site storage

# “Principles for Safeguarding Nuclear Waste at Reactors”

- Supported by many national and local groups from all 50 states
- Improved storage in spent fuel pools and HOSS substantially increases security and safety (not just from terrorists) and will increase trust and confidence

# On-Site Storage

## Recommendations for final report

- It will take decades to open permanent disposal facilities (and any off-site CIS). This reality and the continuing SNF generation mean that interim storage of substantial amounts of SNF at operating reactors will continue for as long as they operate and for years more.
- Nuclear utilities should implement spent fuel pool storage improvements and HOSS, and the NRC should issue regulations for those safety and security improvements.
- New reactors should provide on-site storage for the total amount of spent fuel that they will generate during their operating lifetime, appropriate for many decades.

# Consolidated Interim Storage is part of the same failed approach

- “Monitored Retrievable Storage” sites have been strongly opposed in TN, WY, and elsewhere
- Goshute and Mescalero sites were strongly opposed and have not operated

# Off-Site Storage

## Recommendations for final report

- The federal government and nuclear utilities should not develop off-site consolidated interim storage facilities. Instead, HOSS facilities should be implemented.
- A broad-based process should begin to revise nuclear utility contracts to address liability and costs and other long-term on-site storage issues.

# Geologic Disposal

- Given the reality of more than 65,000 metric tons of SNF already in storage and the expectation of at least a doubling of that amount of waste by 2050, SRIC believes that it is unrealistic for one geologic repository to be sufficient.

# Disposal Recommendations for final report

- EPA should develop generic disposal standards through a robust, transparent public process.
- EPA and NRC should coordinate closely in the development of new repository performance and compliance regulations.
- Disposal site selection should not proceed until WIPP's operational and decommissioning phases are completed.
- Site selection should first focus in Eastern states.

# Defense High-Level Waste

- Defense HLW from reprocessing (which should not occur in the future) is a major environmental and health problem at Hanford, WA; Idaho National Lab; Savannah River, SC; and West Valley, NY.
- Rather than pursuing off-site storage or disposal, HLW, like SNF, should be stored as safely as possible as close to the generation site as possible.

# HLW Recommendations for final report

- Defense high-level waste should be removed from tanks, solidified, and placed in robust on-site storage appropriate for many decades to a century.
- Communities and states with long-term HLW storage should be engaged in a broad-based process to determine what compensation, monitoring, and safety and security requirements are needed to maintain long-term storage or disposal.

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