

# Alliance for Nuclear Accountability

*A national network of organizations working to address issues of  
nuclear weapons production and waste cleanup*

October 12, 2011

## Member Groups

Beyond Nuclear  
Blue Ridge Enviro. Defense League  
Coalition for Health Concern  
Colorado Coalition for the Prevention  
of Nuclear War  
Concerned Citizens for Nuclear Safety  
Fernald Residents for Environmental  
Safety and Health, Inc.  
GA Women's Action for New Directions  
Hanford Challenge  
Healing Ourselves and Mother Earth  
Healthy Environment Alliance of Utah  
Heart of America Northwest  
Just Peace  
Miamisburg Enviro. Safety & Health  
Nuclear Age Peace Foundation  
Nuclear Watch New Mexico  
Nuclear Watch South  
Oak Ridge Enviro. Peace Alliance  
Peace Action Education Fund  
Peace Action West  
Peace Farm  
PeaceWorks Kansas City  
Physicians for Social Responsibility  
Physicians for Social Responsibility  
- Kansas City  
Portsmouth/Piketon Residents for  
Environmental Safety & Security  
Rocky Mt. Peace & Justice Center  
Snake River Alliance  
Southwest Research and  
Information Center  
Tri-Valley CAREs  
Women's Action for New  
Directions  
Women's International League for  
Peace and Justice

Dear Commissioners:

The Alliance for Nuclear Accountability (ANA) is glad that the BRC has chosen to hear concerns from the Northeast, but we are troubled by the pattern of for-profit industry perspectives being highlighted while public involvement is often marginalized. We have expressed this concern from the beginning and suggested ways to correct the problems, including adding tribal and community interest representation to the advisory groups. Limiting public comment to three minutes (or less) is not an effective way for the BRC to benefit from the experience and wisdom of affected communities. Additionally, our experience participating in the Denver meeting lead us to believe that breakout sessions were not effective either, with inadequate and inaccurate reporting making it impossible for commissioners to receive feedback from participants.

## **ANA recommendations to the Blue Ribbon Commission on Northeastern issues**

- **Stranded Spent Nuclear Fuel**

Spent nuclear fuel being stored on site at shut-down reactors is still the responsibility of the utilities that generated it. At sites in the northeast it is in dry cask storage. At other sites, spent nuclear fuel at shut-down reactors should be removed from cooling pools.

To quote the BRC's draft report, "Recognizing the substantial lead-times that may be required in opening one or more consolidated storage facilities, dispersed interim storage of substantial quantities of spent fuel at existing reactor sites can be expected to continue for some time." The simple fact that it will take substantial time for storage sites to become operational, should not delay the removal of spent fuel from cooling pools. We can immediately begin placing this spent fuel in hardened, passively cooled storage casks that could be safely stored on, or very near the site of generation. Affected communities should be involved in monitoring the sites and planning for how to handle the stored fuel.

- **Transportation**

The safest, least expensive, and easiest way to deal with nuclear waste is to transport it as little as possible. Interim storage need not be consolidated. Shipping nuclear waste around the country necessitates expensive safety upgrades to transportation routes and creates unnecessary environmental and human health risks.

Nuclear waste should only be moved for interim storage if it improves





safety. Otherwise, nuclear waste should not be moved until it is bound for a permanent storage site. Operating reactors already have the level of security that Hardened On-Site Storage (HOSS) would require.

ANA supports HOSS and recommends hardening spent nuclear fuel in passively cooled casks as close as possible to the site of generation.

- **Reprocessing**

As we have learned at West Valley, reprocessing is a dirty, inefficient way to deal with spent nuclear fuel.

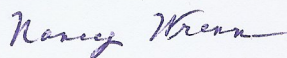
The Nuclear Regulatory Commission, Department of Energy & private utilities have a responsibility to clean up the environmental devastation wrought by reprocessing.

Reprocessing creates new toxic waste streams and does not eliminate the long-term need for nuclear waste storage. The high level waste at West Valley must be vitrified and spent fuel should be hardened in passively cooled casks on site, not transported throughout the region and country.

Across the globe, the reprocessing industry is on the decline. As a nation, we cannot afford to dedicate our resources to reprocessing or research and development on reprocessing technologies.

ANA members across the country call on you to take these comments to heart, and we urge the Commission to offer improved opportunities for public involvement at the upcoming meetings in Minneapolis, Atlanta, and Washington, DC. As the Commission finalizes its report, we ask that you include strong recommendations about the importance of including Tribes and community interest groups in all future processes and decision making concerning nuclear waste.

Sincerely,



Nancy Wrenn, on behalf of the Alliance for Nuclear Accountability