Dr. Edward L. Wilds Jr. comments for the Blue Ribbon Commission on America's Nuclear Future public meeting on Managing the Back-End of the Nuclear Fuel Cycle, Stranded SNF/HLW Dilemma: Consolidated vs. On-Site Interim Storage Panel on Wednesday, October 12, 2011 in Boston, MA

I would like to thank the Blue Ribbon Commission on America's Nuclear Future for the opportunity to speak this morning.

My name is Dr. Edward Wilds and I am the Director of the Radiation Division at the Connecticut Department of Energy and Environmental Protection and Connecticut's designee to the Northeast High Level Radioactive Waste Transportation Task Force. The Department of Energy and Environmental Protection is an Executive Agency of the State of Connecticut. It is charged with representing the public's interest with regard to matters related to ionizing radiation and the Radiation Division is specifically responsible for this function within the Department.

This morning I am going to limit my comments to three issues related to consolidated vs on-site storage. Specifically I would like to address issues related to the States being true partners in the process, need for a long term solution, and the need for the federal government to meet its obligations to remove spent nuclear fuel from reactor sites, especially from single unit decommissioned sites.

1) States Partners in Solutions
    a) Finding solutions to the issues related to transportation, security, storage, and final disposition will be a challenge, but it is not insurmountable. Too often the federal government ignores the expertise located within the states and their ability to think outside the box. This is not to say that the federal government never partners with the states. US Department of Energy recognized that this was the proper path and workable solutions were identified for several transportation related issues. Unfortunately this working group was disbanded for a new program. Hopefully the lessons learned from the Transportation External Coordination Working Group can be applied to this problem.
    b) I cannot stress enough that State involvement must be as a partner to solve these issues.
        i) Forming a working group with the focus being that there is state membership and without the commitment to listen to the States seriously is not a partnership. Partnership is much more that just allowing membership to a group. It involves trust and a commitment to find a common solution taking into consideration all concerns.
            (1) An example of "State partnership" that is doomed to fail is what the States experienced during the events at Fukushima and the US response. If this is the model that is applied, a final solution will probably never be found. We will get close and then restart the process just like we are experiencing now. In this situation the federal government did not trust the states with even general information and made several missteps that could have easily been avoided.
            (2) An excellent example of this partnership was the US Department of Energy's Transportation External Coordination Working Group. DOE engaged States as true partners to find workable solutions to common issues. This is not to say that there were not disagreements or that everyone agreed 100% with every proposal, but generally acceptable solutions were identified.
2) Long Term Solution

a) It is vital that a long term solution be found. The uncertainty associated with changing paths does not allow local communities to appropriately plan for the future.
    i) Land Use Issues
        (1) Adjusting to changes in policy that now allows for indefinite long term storage can have severe impacts on a community. Long term issues related to law enforcement, emergency planning, redevelopment of the land, and economic development must be re-addressed as policy changes. Taking the position that long term on-site storage to me seems to go against the first strategy recommended by the Blue Ribbon Commission that a consent-based approach be used to siting future nuclear waste management facilities. Independent Spent Fuel Storage Installations and Spent Fuel Pools are nuclear waste management facilities. There was no effort to get consent today of the local communities that accepted nuclear power plant facilities years ago when the federal government accepted the obligation to remove and manage the spent nuclear fuel. This problem is most noticeable at single unit decommissioned sites. Redevelopment is on hold awaiting another federal solution.
    ii) Environmental Issues
        (1) With indefinite onsite storage the fuel at some point will likely be required to be reloaded into new casks. This could be due to degradation of existing casks due to age/decay, or failure to obtain U.S. Nuclear Regulatory Commission recertification. Single unit decommissioned sites performed their decommissioning activities with the federal obligation for fuel management and disposal outlined in existing federal law. They removed buildings and structures for fuel repackaging. Cask reloading for any reason would require multiple facilities to be built for fuel handling, one at each site. During fuel handling under these conditions, there is an increase risk for these multiple site locations to become contaminated. This potentially could lead to increased environmental impact due to the increased number of locations, translating into greater national expense and a greater potential for land use restrictions. It would also require the site to be decommissioned a second time.

3) Federal Government Must Meet Its Obligations to Remove SNF
    a) The credibility of any solution developed at this time will be impacted by the federal government's willingness to meets its obligations as outlined in the Nuclear Waste Policy Act. If it does not meet these obligations, what assurance can the public have that federal government will meet any of the recommendations being put forth by the Blue Ribbon Commission in the future.
        i) This is most evident at single unit decommissioned reactor sites where the only activity being done today is the storage of spent nuclear fuel. This has placed redevelopment of the land in limbo that in turn impacts potential economic development.
        ii) Though it is not an immediate issue as most operating reactor sites. It does impact local communities in areas such as law enforcement and emergency planning.

I would like to thank the Subcommittee members again for allowing me to speak today and hope that what I provided has been informative and will help you in your deliberations.