

\*BLUE RIBBON COMMISSION  
\*COUNCIL OF STATE GOVERNMENTS  
\*NORTHEAST HIGH-LEVEL  
RADIOACTIVE WASTE TRANSPORTATION  
TASK FORCE

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# Introduction

- Greatly appreciate the Commission's service in evaluating ways to get nuclear waste back on track
- VT and NARUC believe that NRC should be required to fulfill its obligations to complete the Yucca Mountain license review regardless of any instructions the BRC received from the Secretary and any movement toward consolidated storage
- Agree that nuclear waste program is at an impasse and needs forward momentum

# CONSOLIDATED STORAGE PLUSES

- Idea of centralized interim storage not new but it is the first time it is being proposed at this level
- NARUC has long advocated for not having interim storage on site
- NARUC supports the need to relocate the stranded spent fuel from the 9 decommissioned sites in a centralized location
- Clear that centralized interim storage will provide economies of scale benefits and security enhancements
- Agree with “consent-based” approach to siting

# CONSOLIDATED STORAGE CONCERNS

- We agree with the report that a deep geologic repository is needed
- Concern that creation of consolidated storage will become “problem solved” permanent
- Need to make it clear that the geologic repository is needed not only for waste with a low probability of re-use but for all waste – even that in centralized storage

# CONSOLIDATED STORAGE FINANCING

- Concern about the financing of consolidated storage and claims of savings great enough to pay for a facility.
- Consolidated storage does have the benefit of “preserving options” as indicated in the report but the report also talks about the purpose of consolidation as reducing government liabilities for breach of the standard contract.
- Distinction should be made in looking at savings between costs DOE could have avoided had it acted sooner on consolidated storage and actual savings from consolidation. Protect the NWF and by extension the ratepayer.

# Conclusions

- Consolidated storage will be an improvement from the ad hoc dry cask storage now in place
- Stand alone decommissioned sites should be first in line
- Need more definition on scope of consolidated storage
- Need cost estimates and accountability for moving forward and determinations re what ratepayers should pay for from the NWF
- Need clear direction that consolidated is not problem solved
- Thank you