## Statement to the Blue Ribbon Commission on America's Nuclear Future

James Connell, Vice-President and Independent Spent Fuel Storage Installation Manager, Maine Yankee Atomic Power Company

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Distinguished Commissioners, ladies and gentlemen, my name is Jim Connell. I am Vice-President and Independent Spent Fuel Storage Installation Manager for Maine Yankee Atomic Power Company in Wiscasset, Maine where I have served as an engineer in a variety of capacities for 30 years. Additionally, I have professional responsibilities at Connecticut Yankee Atomic Power Company in Haddam, Connecticut and Yankee Atomic Electric Company in Rowe, Massachusetts. The three are separate entities known informally as the "Yankee Companies" but are linked through their oversight and shared management services.

We commend the Commission for its draft recommendation that spent nuclear fuel (SNF) at decommissioned reactor sites should be "first in line" for transfer to consolidated interim storage. We agree this finding makes good policy sense from an economic and equity perspective. Further we support strongly the Commission's draft near-term action recommendations

for the U.S. Department of Energy (DOE) using existing authority to begin implementing consolidated interim storage and the transportation planning necessary to accomplish that. I am grateful for the opportunity to participate in this discussion on the issues of stranded SNF and Greater than Class C waste (GTCC) stored at our Independent Spent Fuel Storage Installations (ISFSI). The continued burden on the ratepayers of New England and our local host communities is substantial.

All that remains at each of these former nuclear power plant sites is an ISFSI storing the SNF and GTCC waste generated during the years of operation. As U.S. Nuclear Regulatory Commission licensees, it is our responsibility to store the SNF and GTCC waste safely and securely in accordance with all applicable regulations until the federal government fulfills its obligation to remove this material from our sites as required by contract and the Nuclear Waste Policy Act. The federal government was obligated to begin removing this material in January 1998 and we are now nearly a decade into dry cask storage of this material at the three Yankee sites.

At Maine Yankee there are 60 canisters loaded with SNF and four with GTCC waste; at Connecticut Yankee there are 40 canisters loaded with SNF and three with GTCC waste; and at Yankee Atomic there are 15

Table 1 on Page 40 of the Blue Ribbon Commission's July 29, 2011 Draft Report be revised to more accurately state the total number of canisters at each of our sites as well as the total number of canisters loaded with GTCC waste. We encourage you to make this factual adjustment to the chart in the Final Report.

The current annual cost to operate our three ISFSIs is approximately \$24 million. We are concerned the annual cost to our ratepayers will only increase the longer the SNF and GTCC remains stranded at our sites. In addition to the future costs associated with the inevitable changes and additions to existing ISFSI regulatory requirements, we are concerned about the increased costs to New England's ratepayers from extended storage issues involving canister relicensing and ultimate transportation of the SNF and GTCC waste that is the responsibility of the federal government to remove.

In December 2010 the NRC finalized changes to its Waste Confidence Rule finding that SNF can be safely stored for at least 60 years beyond the licensed life of a reactor. NRC staff is now engaged in a process at the direction of the Commission to analyze the safety of SNF storage at plant sites or interim storage facilities for up to 300 years. The longer the SNF

and GTCC waste remains at the three Yankee sites, the more costly it will become for the region's ratepayers. Indefinitely stranding the material at the Yankee sites makes little sense. Centralized Interim Storage as your draft report suggests addresses this issue with our full support.

In closing I want to thank members of our community advisory panels, local communities, and state and federal elected officials for remaining engaged over many years in the effort to have SNF and GTCC waste removed from our sites so that the property can be returned to beneficial use and the burden on ratepayers lifted. I also want to thank again the Commission's Transportation and Storage subcommittee for meeting in Wiscasset in August 2010 to learn first-hand about the issues of stranded SNF. You listened to us then and we appreciate the opportunity to continue the conversation today.