

Public Comments
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Thank you again for the opportunity to speak on behalf of ANS and offer my response to your draft report. As you aware, I first testified on May 19, 2010 on the behalf of the 11,000 men and women at the ANS. At that time, I had created a special committee on used nuclear fuel management options. That committee completed its work and delivered its final report to you early this year.

I applaud the work of the commission and am pleased to see that many of our recommendations and concerns have been recognized and included in the commission's findings.

As such, I will now only comment on recommendations in the near term actions. The BRC recommends that the US support multi-national industrial scale fuel cycle facilities to lead and improve security and accountability technologies and protocols for nuclear materials and framework improvements. Later, the commission notes correctly that the US has a successful initiative to ship used high risk foreign research reactor fuel to US facilities for storage, processing, and disposal. Please note that this is in fact a large industrial scale enterprise that represents a well funded and designed collection of facilities and systems that could yield considerable knowledge about the operations and issues associated with the "back-end" of the fuel cycle. We recommend that the SR facilities be incorporated into the commission's "near term actions" regarding establishing user facilities.

Please note that a working prototype of the entire back-end system of a fuel cycle exists if defense wastes, military fuel and fuel received to reduce proliferation risks are included in the BRC's analysis and recommendations. Defense wastes, high risk fuel and materials, and even some commercial fuel are now being transported, stored, processed, and consolidated at Idaho, Savannah River, WIPP, and Hanford. This Defense Funded Infrastructure offers a complete system prototype for users to evaluate and analyze virtually all concepts proposed for any spent fuel disposition strategy. Significant investments are being made that could be easily leveraged to accelerate the actions proposed by the BRC.

Finally, the BRC report needs to recommend that the non-commercial nuclear materials enterprise be considered as candidates for regional consolidation of defense HLW and

used fuel. The Carlsbad, NM community has offered to be the host of a regional storage enterprise for vitrified HLW. This would allow us to start moving materials sooner, perhaps opening opportunities for further consolidation in other areas.

The value of moving forward on what can be done now to demonstrate transport, storage, and where necessary, processing of high risk materials, cannot be over emphasized. We like to remind everyone as stated in our May testimony, that the nuclear waste “problem” is and has always been largely a political problem. Fundamentally, the only important shipment of waste to the Defense repository at WIPP was the first one - after that, the politics were eliminated. We urge you now to build on the success of these national security programs and start the “engine” that will result in adequate regional solutions in the near term rather than reevaluating concepts that already exist.

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