

**Nuclear Information and Resource Service * Beyond Nuclear * Nuclear Energy Information Service
Grandmothers, Mothers and More for Energy Safety * Stand Up/Save Lives Campaign * Northwatch**

November 16, 2010

Honorable Lee Hamilton and Honorable Brent Scowcroft, Co-Chairs
The Commissioners
The Blue Ribbon Commission on America's Nuclear Future

Commissioners,

Thank you for this opportunity to address the “Key Questions” which have guided your inquiry into national radioactive waste issues and concerns. The “Grassroots Answers” document has 168 groups signed on in support as of today. We are sure there will be more! In addition, this statement has been signed by more than 3,300 individuals; we present those names to you today as well.

This cover letter, originating from groups that have lead the process of creating this collaborative document will provide some explanation of who “we” are and what common principles and concerns underlay our participation with the Blue Ribbon Commission on America's Nuclear Future. Additionally, it lists our major areas of concern, as detailed in the accompanying Answers to BRC Questions document.

We address you representing organizations with members who are directly impacted by industrial-scale nuclear operations, both civilian and military. We, our members and allies, are working diligently to contain, prevent and reduce harm to our communities – and we are here to remind you: there is no safe dose of radiation. In addition to consequences to the individual in the form of disease and death, loss of an individual always impacts a family and ultimately the community. Because ionizing radiation has the additional potential for causing genetic damage, we see our work as being on behalf of future generations.

While our government and its expert bodies recognize the truth that there is no safe dose of radiation,¹ that some fatal cancers can result from radiation exposures so small that they could not even be measured as a dose, we are inexplicably told that the contamination is safe. Our bodies, our air, our water, our food, the health and wellbeing of our children seem to be considered as “externalities” in the business case for nuclear energy, and are discounted in federal assessments of the negative health impacts of life at or down stream of nuclear weapons production sites.

The military industrial nuclear activities of the past seven decades have desecrated the earth at every step of the nuclear fuel cycle, vaporized whole cities in seconds, bequeathed agonizing death from radiation sickness, and as the nuclear age lumbers on has added new, man-

¹ This fact is, among other places validated by the National Academy of Sciences Biological Effects of Ionizing Radiation reports, including the most recent -- BEIR VII.

made radioactive elements, regularly and accidentally, into the biosphere which sustains life on earth. Ending the industrial production of radioactive waste is our goal. There is a need for a substantial nuclear industry, not for building new reactors, but rather for environmental cleanup and creating enduring safe isolation of the radioactive elements and toxins from the biosphere.

Such nuclear expertise will be needed for safe and efficient programs of nuclear disarmament and weapons dismantlement, and in the electrical energy generation field (which has produced the most waste), a transition from nuclear power to efficient use of non-nuclear, sustainable and renewable energy. Major water systems are in peril of radioactive contamination, the Susquehanna, Columbia, Snake and Savannah Rivers to name four major examples. Research money and job creation should be for these ends, to control, contain and manage the nuclear elements already out of hand in our environment. Such scarce public resources should not be used to create more radioactive waste.

In our view we are faced with a double crisis: carbon and curies – and unless we cap both of these, there will not be a viable, healthy future for our society. It is a false logic that commends nuclear energy as a solution for carbon – investment in aggressive use of energy now wasted delivers up to twenty times more carbon displacement per dollar invested, compared to building new reactors. Even if there hypothetically were no impediments to new reactor construction, real world production capacity for new reactors is insufficient to make a significant difference in carbon emissions. The solution to carbon emissions and climate change will thereby be non-nuclear.

The very fact that a society made up of mammalian *Homo sapiens* has created a terrestrial-based hazard that will endure far longer than any society ever has, points to the enormity of the challenge we face together. The magnitude of the challenge should inspire the highest determination to achieve the best outcome. We work for this – not only for ourselves now – but for all those who will follow to live, work and play during the period of radiation hazard that we have, and currently are, creating.

The use of the inclusive term “we” is reflexive in our community; we do not seek to polarize or needlessly inspire blame and acrimony – however we must note that standing here, before this Commission, the term “we” is a bit harder. We respect the Commissioners and your service – but we must note once again, as was noted at your first meeting – there is no one on this Commission who truly represents us. There is not one among you who is from what we broadly refer to as “the grassroots.” Besides the grassroots environmental movement not being represented on this Commission, there is also no representation from families suffering from illness -- even in their own children -- that may be due to radioactivity in their air, food or water. And notably, none of us serve – as so many of you do -- on the Board of Directors of corporations which operate nuclear facilities.

Since a portion of the Commission’s business is to consider trust and how to inspire it – we note that the composition of this Commission would have been a good place to start. We do not assume, however, that this means that we cannot share the same goals and develop a trustworthy working relationship that will advocate for the most long-lasting and

environmentally safe and sound paths to isolate the many forms of radioactive waste from the biosphere.

Isolation of radioactivity is our goal. You will find in our “answers” to the Commission’s “questions” that we recognize that there will be a number of steps – a process – to deliver isolation of radioactive waste from the Biosphere, including a whole lot of cleaning up! We ask that the Commission be unequivocal in sharing and supporting this goal of isolation in its recommendations.

If however the Commission does not share this goal of isolation of radioactivity from the biosphere, we ask you to make that clear, not only to your colleagues, but to our communities, who are currently impacted by radioactive waste. Please provide us with the detailed evidence and rationale that might lead you to conclude that more nuclear waste, more radioactive contamination of the biosphere, is sound public policy for our individual communities and the world as a whole, today and for future generations.

Our three main arguments, presented in greater detail in the accompanying Answers section, are:

- 1) Reduce and ultimately cease the production of radioactive waste; as a group of varied radioactive materials, they are a very long-term, real and present danger to human and all living genomes, which thereby needs to be isolated from the biosphere. Waste must no longer be assessed as an “externality” and the true cost must be seen to outweigh any advantage to these weapons and energy systems. There are other ways to resolve conflict and other ways to generate electricity.
- 2) Implement Hardened On Site Storage (HOSS) to provide adequate interim safeguards for the current inventory of high-level nuclear waste, as described in the “Principles for Safeguarding Nuclear Waste at Reactors” attached here. All other radioactive wastes should be treated from this same perspective of providing maximum/total isolation from the biosphere with a minimum of transportation. This approach is a one hundred year temporary solution to allow a complete and comprehensive plan to be developed to address all types of radioactive waste and inventories.
- 3) Pursue vigorous environmental protection and clean up activities to contain and remediate current radiological threats to the environment and communities, and to prevent future exposures, promulgating standards with a goal for zero release of radioactivity for storage and permanent isolation and zero exposure for operations; while mandating a series of concrete, enforceable steps to attain this goal.

The accompanying document provides our consensus answers of more than 30 co-authors to the “Key Questions” that you posed to us. This collaborative document is supported by the groups that are signed on to it. Also included is discussion of questions that we feel to be of importance to the resolution of this vexing challenge of radioactive waste management.

We look forward to your response to our written comments and oral presentation at the November 15-16, 2010, Washington, D.C. Blue Ribbon Commission Meeting.

Sincerely,

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