Blue Ribbon Commission on America's
Nuclear Future
January 7, 2011



Manuel Bettencourt, Chairperson SRS Citizens Advisory Board

SRS CAB Position on Managing the Back End of the Nuclear Fuel Cycle

- 1. SC State regulatory mechanisms do have authority over the ultimate cleanup of SRS. The existence of high level waste at the site would definitely impact State cleanup decisions and associated time frames.
- 2. DOE has an affirmative obligation under Public Law 107-107 to plan, remove and dispose of Pulaced HLW from SRS.
 - -- Pu has been added (waste has not been kept segregated) to the HLW, so the plan must address disposal for all HLW.
 - -- DOE has failed to revise its disposition plan to reflect the Government's termination of the Yucca Mountain licensing proceeding.

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- 3. Reprocessing of nuclear fuel is in the national interest.
 - -- Within our nation and throughout the world, the reprocessing of spent nuclear fuel has been demonstrated.
 - -- Enhancement of proven and pursuit of transformational technology within the full fuel cycle should be national goals.
 - -- The challenge is to reduce the generation of high level waste in reprocessing and to minimize the associated costs and risks.
 - -- The SRS H-Canyon facility is the only large operational reprocessing facility in the United States. The National Academies of Science has identified H-Canyon as a National Resource.
 - --- We recommend the BRC identify H-Canyon as a significant resource to be maintained for R&D related to reprocessing.

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4. We are very concerned about the substantial utility tax paid by citizens and already spent to create an underground repository.

Further, previous planning for an underground repository could be used to accommodate defense waste independent of commercial waste.

Specifically, c3000 SRS DWPF canisters are ready to go!

5. BRC Advisory Committee Charter, para 3f states: "Specifically, the Commission will provide advice, evaluate alternatives, and make recommendations for a new plan ..., including: Options to ensure that decisions on management of used nuclear fuel and nuclear waste are <u>open and transparent, with broad participation</u>"

Given this mandate, we are puzzled as to why the public has been asked to participate in this process without being privy as to <u>why the previous effort to create an</u> <u>underground repository was not technically or politically acceptable.</u>

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Background: Lack of a Federal Repository for Nuclear Waste disposition and storage.

- The content of the SRS Defense Waste Processing Facility canisters has been formulated based on the waste acceptance criteria for the Yucca Mountain Federal Repository.
- The communities surrounding SRS are beginning to believe that the SRS will be a de facto long-term waste storage site if a federal repository for nuclear waste does not become operational.
- The state of South Carolina has been promised by DOE that the state will not be used for long-term storage of plutonium or High Level Waste.
- Credibility and costs are at issue. To study another repository to the same degree as Yucca Mountain would take decades to complete. 2nd Repository needed. Storing waste at multiple sites around the country is a cost and safety/security concern.
- Citizens have not been provided the technical or scientific basis for cancellation of the Yucca Mountain Federal Repository.

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Background: Consolidation and disposition of plutonium

- Discussion of plutonium storage and disposition plans at the SRS date back to the mid-1990's.
- In December 2003, the DNFSB urged DOE to "Expedite the development of a complete, well-considered plan for the disposition of all excess plutonium to preclude unnecessary extended storage of plutonium at SRS."
- DOE needs to finalize plans for the disposition to preclude unnecessary extended storage of plutonium at the SRS as promised to the state of South Carolina.
- Surplus Pu Disposition SEIS Public Scoping Meeting was held 8/17/10
 - ➤ Disposition options for additional 7 MT of pit Pu and 6 MT of non-pit Pu
 - ➤ Vitrification is included in several options at SRS
 - ➤ Completion of ROD is key in finalizing Pu disposition plans at SRS

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