

Summary of Comments to the Blue Ribbon Commission Disposal Subcommittee
By Judy Treichel, Executive Director – Nevada Nuclear Waste Task Force
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1) Is a disposal facility (or facilities) needed under all foreseeable scenarios?

At some point permanent, passive disposal is needed. It could be deep geologic, or not. While Yucca Mountain would have been an underground facility, it was far from what a “deep geologic” repository was supposed to be. It was an engineered facility located underground, with the geology contributing almost nothing to waste isolation.

While dry storage at reactor sites can and should be used until more permanent solutions are developed, the waste in pools and dry cask storage will require maintenance and monitoring. Dry casks will eventually have to be unloaded and the contents be placed in other casks either for continued storage, transport or disposal. If this system is to be used for 300 years or so, there will likely be a need to re-containerize some or all of the waste. This could be more difficult than we think, and so it should be limited. Likewise, the need for pools should, at some point, be eliminated.

2) If so, what are our alternative approaches for disposal?

Alternatives for disposal – who knows? Secretary Chu advised the members of this Commission to be open-minded and flexible because it is impossible to know what technologies would be discovered in the future. What we do know with certainty is that Yucca Mountain provides a clear example of a bad approach. The guiding principle of DOE’s approach to the Yucca program was one of “decide, announce, defend.” Many of the decisions were ill-conceived and wound up being indefensible. One could say that Yucca Mountain was a bad site with good watchdogs.

3) What should the disposal system development process look like?

The MOST important element for developing a new system for waste disposal is: Establish rigorous, publicly understood and accepted rules, regulations and standards BEFORE any sites are identified or any siting process is undertaken. These new rules should be written after more research is done and a far better understanding exists regarding the materials to be disposed. The new regulations would not be suggested guidelines but rather hard and fast rules that systems and/or sites would have to fully comply with, and could not be changed based on conditions encountered with any specific site. If Yucca Mountain has taught us anything, it is how expensive it is in terms of time, money and public confidence to have rules changing to fit a site. If DOE had abandoned Yucca Mountain when the first evidence appeared that the original EPA standard could not be met, less money would have been wasted and DOE could have begun again, this time with a volunteer host, under circumstances in which the public would have had concrete evidence of DOE’s commitment to a scientifically suitable site.

U. S. high-level nuclear waste and irradiated commercial nuclear fuel disposal MUST NOT be awarded to a private or public-private entity. Corporate profit is not an appropriate incentive when assurance of public safety for a million years is the ultimate goal. Corporations can shed liability and walk away from losses with little or no recourse for a community. The dangerous lifetime of the materials and implications for national security require this to be a job for the federal government.