

December 4, 2013

To: The U.S. Nuclear Waste Technical Review Board

On Tuesday November 19, the undersigned representatives of public interest groups attended and participated in the TRB workshop on irradiated fuel repackaging, transport and disposal.

There were two breakout sessions – one considering implications of repackaging irradiated fuel for transport to storage, and the other was focused on direct disposal of large dry-storage canisters. Both of those sessions were valuable and the discussions were good. We were able to flesh out important issues to be considered. However, we believe that there was an extremely important scenario that was left out.

We think that extended storage of irradiated fuel at the point of generation should have also been considered. In fact that scenario is the only currently realistic one. At-reactor storage is or has been a default condition but in fact it is reality and the only available option indefinitely. There is no centralized storage facility or permanent disposal site. Additionally, the court has ruled that the NRC must reconsider their “waste confidence” rule since there is no assurance that waste can or will leave reactor sites within the foreseeable future. All of us signing this letter as well as 200 other organizations, support Hardened On-Site Storage (HOSS) as the best way forward for current on-site storage and extended, long-term storage at reactor sites which will very likely be a necessity.

During the discussions in the afternoon, regarding the issues identified in the breakout sessions, we found it difficult to participate or contribute because the issues were all speculative. If there had been consideration of extended on-site storage and HOSS, actual real-time issues at existing sites could have been considered.

One of the topics discussed was that of standardization of casks. That begins at the reactor sites and should or could be a significant part of the HOSS extended storage scenario that we believe the TRB should consider. Cask standardization would lead to better policy options and through incentives could be attractive to utilities and serve their, as well as the public’s interest.

The groups that we represent as well as many other organizations oppose centralized storage. During the breakout sessions, many of the problems and issues that were fleshed out in the discussions would be eliminated if waste is repackaged and transported fewer times. If irradiated fuel is kept at the point of generation until a disposal facility is available, three or four of the columns on the matrix used during the sessions would be eliminated, reducing worker doses and damage to fuel. Transport and expense would also be reduced and public safety would be increased.

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