Alliance for Nuclear Accountability * Blue Ridge Environmental Defense League * Carolina Peace Resource Center * Citizen Action Coalition of Indiana * Citizen Alert * Clean Water Action * GRACE Public Fund * Greenpeace * HEAL Utah * Heart of America Northwest * National Environmental Trust * Nevada Nuclear Waste Task Force * Nuclear Age Peace Foundation * Nuclear Energy Information Service * Nuclear Information and Resource Service * Nuclear Watch of New Mexico * Nuclear Watch South * Nukewatch * Peace Farm * Physicians for Social Responsibility * Physicians for Social Responsibility-Madison * Public Citizen * Sierra Club * Snake River Alliance * Southern Alliance for Clean Energy * Southwest Research and Information Center * U.S. Public Interest Research Group * Yes on I-297: Protect Washington

May 9, 2006

Re: Oppose "interim" surface storage for commercial nuclear waste at U.S. Department of Energy or any other sites

Dear House Energy and Water Appropriations Subcommittee Member:

As national public interest, consumer and environmental organizations, we are writing to urge you to oppose any legislation that would rush the transport of commercial irradiated nuclear fuel onto roads, rails, and waterways across the U.S. in order to store these highly radioactive wastes at "interim," or indefinite, surface storage sites. Creating centralized surface storage would not solve our country's commercial irradiated nuclear fuel problem. In fact, centralized "interim" storage is a worse option than leaving most of the waste stored at the reactor sites for the time being.

U.S. Department of Energy (DOE) sites that could be targeted for centralized surface storage include facilities in California, Colorado, Idaho, Illinois, Kentucky, Nevada, New Mexico, New York, Ohio, Oklahoma, South Carolina, Tennessee, Texas, and Washington (see list at below). The Private Fuel Storage facility on the Skull Valley Goshute Indian Reservation in Utah could also be targeted for "interim" storage, as could other locations in the United States.

- **Creating surface storage sites would not meaningfully reduce the number of locations where high-level radioactive waste is stored**, as long as most commercial nuclear power plants remain in operation for decades to come. Nuclear waste generated at nuclear power plants must be stored on site for at least five years to thermally cool and radioactively decay before it can be transported off site. Thus, any operating reactor will inevitably have at least five years' worth of irradiated nuclear fuel – approximately 100 tons – stored on site.

- **Rather than reduce risks, centralized "interim" storage would increase transport risks to public health, safety, and security.** "Interim" storage would double the number of waste shipments required, and greatly increase the number of shipment miles to be driven, because the waste would eventually need to be transported from the interim site to a permanent site. According to a February 2006 National Academy of Sciences (NAS) study on the transport of nuclear waste, "an independent examination of the security of spent fuel and high-level waste" needs to be performed "*prior to* the commencement of large-quantity shipments." [emphasis

added] The NAS report also concluded that "extreme accident conditions involving very-long-duration fires could compromise" waste shipping containers and advised that the U.S. Nuclear Regulatory Commission (NRC) do additional analyses of such accident scenarios.

- **Interim storage at DOE sites is contrary to legal agreements made with States and tribes.** DOE has committed to cleaning up these sites, not adding more pollution to them. In addition, DOE sites are not licensed by the NRC for commercial nuclear waste storage. The Idaho National Laboratory license is for nuclear fuel debris from the Three Mile Island nuclear reactor accident.

- **Surface storage at Yucca Mountain would make it impossible to have an unbiased, scientific analysis of DOE's license application.** If waste is stored at Yucca before it is licensed as a permanent repository, the political and financial investment at the site would prevent the NRC from being able to do an independent and objective evaluation of DOE's license application. The law states that "interim" storage and a permanent repository cannot be located in the same state; the intention of the licensing process set up under the Nuclear Waste Policy Act of 1982 is to "ensure that such waste and spent fuel do not adversely affect the public health and safety and the environment of this or future generations." NRC should be allowed to carry out this mandate without an overriding public perception that the licensing process is rigged, a "done deal" before it even begins.

- **How long is "interim" surface storage?** By the year 2010, the amount of commercial waste generated in the U.S. would fill the capacity of Yucca Mountain, if it ever opens. Given the extreme difficulty faced in opening this country's first permanent repository, it is highly unlikely additional repository space will be available soon. Thus, "interim" storage sites at DOE facilities or elsewhere would become long-term "overflow parking" for high-level radioactive wastes with nowhere else to go. "Interim" would likely become indefinite. Even Private Fuel Storage's pledge that wastes would only be stored for 20 to 40 years rings hollow, for there is no guaranteed alternative location to send them at that time.

- **Centralized "interim" storage would be extremely expensive.** According to Allison Macfarlane, a researcher at the Massachusetts Institute of Technology, the waste storage casks alone that would be required at these sites currently cost between $90 and $210 per kilogram (or $41 to $95 per pound) of waste stored. In other words, to create enough "interim" storage for the more than 50,000 metric tons of commercial nuclear waste currently in the U.S. would cost between $4.5 billion and $10.5 billion, not including licensing, transportation, and other expenses.

Moving commercial irradiated nuclear fuel to indefinite "interim" surface storage at DOE or other sites would simply create the illusion of a waste solution. Instead, the safety and security of waste storage at reactor sites across the U.S. should be improved.

If you have any questions or need further information, please contact Kevin Kamps at Nuclear Information and Resource Service (301-270-6477, ext 14) or Michele Boyd at Public Citizen (202-454-5134).

Sincerely,

Susan Gordon
Director
Alliance for Nuclear Accountability
Seattle, Washington

Louis Zeller
Blue Ridge Environmental Defense League
Glendale Springs, NC

Gerald Rudolph
Coordinator
Carolina Peace Resource Center
Columbia, SC

Peggy Maze Johnson
Executive Director
Citizen Alert
Las Vegas, Nevada

Grant Smith
Executive Director
Citizens Action Coalition of Indiana
Indianapolis, Indiana

Lynn Thorp
Clean Water Action
Washington, D.C.

Alice Slater
GRACE Public Fund (Global Resource Action Center for the Environment)
New York, New York

Jim Riccio
Nuclear Policy Analyst
Greenpeace
Washington, D.C.

Jason Groenewold
Executive Director
HEAL Utah
Salt Lake City, Utah

Gerald Pollet, JD;
Executive Director,
Heart of America Northwest;
Chair,
Yes on I-297: Protect Washington
Seattle, WA

Karen Steuer
Vice President, Government Affairs
National Environmental Trust
Washington, D.C.

Judy Treichel
Nevada Nuclear Waste Task Force
Las Vegas, Nevada

Carah Ong
Washington DC Office Director
Nuclear Age Peace Foundation
Washington, DC

Dave Kraft
Executive Director
Nuclear Energy Information Service
Evanston, Illinois

Kevin Kamps
Nuclear Waste Specialist
Nuclear Information and Resource Service
Washington, D.C.

Jay Coghlan
Director
Nuclear Watch of New Mexico
Santa Fe, NM

Glenn Carroll
Coordinator
Nuclear Watch South
Atlanta, Georgia

Bonnie Urfer
John LaForge
Nukewatch
Luck, Wisconsin

Mavis Belisle
Director
Peace Farm
Panhandle TX

Robert K. Musil, Ph.D., M.P.H.
Executive Director and CEO
Physicians for Social Responsibility
Washington, D.C.

Alfred Meyer
Executive Director
Physicians for Social Responsibility-Madison
Madison, Wisconsin

Michele Boyd
Legislative Director
Energy Program
Public Citizen
Washington, D.C.

Dave Hamilton
Director
Global Warming and Energy Program
Sierra Club
Washington, D.C.

Jeremy M. Maxand
Executive Director
Snake River Alliance
Boise, Idaho

Sara Barczak, Safe Energy Director
Southern Alliance for Clean Energy (SACE)
Savannah, GA

Don Hancock
Southwest Research and Information Center
Albuquerque, New Mexico

Anna Aurilio
Legislative Director
U.S. PIRG (U.S. Public Interest Research Group)
Washington, D.C.

The list of DOE sites that could be targeted for indefinite surface storages includes: Argonne National Lab, Illinois; Brookhaven National Lab, New York; Fernald, Ohio; Hanford Reservation, Washington; Idaho National Lab; Knolls Atomic Power Lab, New York; Lawrence Livermore National Lab, California; Los Alamos National Lab, New Mexico; Mound Lab, Ohio; Nevada Test Site; Oak Ridge Reservation, Tennessee; Paducah Gaseous Diffusion Plant, Kentucky; Pantex Plant, Texas; Portsmouth Gaseous Diffusion Plant, Ohio; Rocky Flats, Colorado; Sandia National Lab, New Mexico; Savannah River Site, South Carolina; Sequoia Fuels Plant, Oklahoma; Waste Isolation Pilot Plant, New Mexico; Yucca Mountain, Nevada.