



# NUCLEAR SECURITY COALITION

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Alliance for Nuclear Accountability  
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Union of Concerned Scientists  
UNPLUG Salem  
Vermont Citizens Awareness Network

March 15, 2005

Dr. Kevin D. Crowley, Director  
Board of Radioactive Waste management  
National Research Council  
The National Academies  
500 Fifth Street, NW, 6<sup>th</sup> Floor  
Washington, D.C. 20001

Dear Dr. Crowley:

We are responding to a December 3, 2004 letter written to you by Luis Reyes, Executive Director of Operation, U.S. NRC regarding the proposed unclassified report concerning the National Academies' study on the safety and security of commercial spent nuclear fuel.

The Congressional Appropriations Committee instructed the National Academies to release a classified report and an unclassified summary report for the public. In NRC's December 3<sup>rd</sup> letter, NRC requests that the proposed unclassified summary report not be released because it contains information "that would be useful to potential adversaries and could reasonably be expected to have an adverse effect on the common defense and security."

We wonder how this could be because the NRC has repeatedly stated that the spent fuel pools are "'well engineered' and 'robust' structures that have features that could blunt the impact of an outside force in an attack."<sup>1</sup>

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<sup>1</sup> INSIDE NRC, Copyright by Platts, McGraw Hill Companies, Inc. June 28, 2004, "NRC Response: NRC has repeatedly said the agency has taken additional measures since the Sept. 11, 2001 attacks to shore up security at nuclear plants. Chairman Nils Diaz and other agency and industry officials also have called spent fuel pools "well engineered" and "robust" structures that have features that could blunt the impact of an outside force in an attack.

NRC said in a "fact sheet" issued last August in a response to a spent fuel pool hazards paper published last year in the Princeton University's Science & Global Security journal that the agency has addressed pool safety and security. The fact sheet notes that NRC had directed licensees to develop strategies for maintaining and restoring spent fuel pool cooling "using existing or available resources" if the cooling is lost or disrupted. Also, there have been improvements to "protective strategies for ground attacks on spent fuel pools."

Clearly from NRC's response we conclude that spent fuel pools are not the "well-engineered" and "robust" structures advertised by NRC - otherwise NRC would not be worried about NAS' report becoming public. NAS must not have reached the proper conclusion, from NRC's perspective, in the report that analyzed spent fuel risks and options to reduce risk.

We see NRC's response to NAS as simply another chapter in NRC's history of covering up the status of security at reactor sites – and avoiding requiring the industry to provide real security at commercial nuclear reactors. For example, on March 27, 2003, NRC Commissioner McGaffigan responded to the study "Reducing the Hazards from Stored Spent Power-Reactor Fuel in the United States" by Alvarez, Beyea, Janberg, Kang, Lyman, Macfarlane, Thompson, and von Hippel published in *Science and Global Security*<sup>2</sup> that established the need for a safer method to store the highly radioactive fuel rods now stored at reactor sites throughout the country - simply by asking NRC staff to deep-six it. Specifically NRC Commissioner Edward McGaffigan ordered his subordinates to produce "a hard-hitting critique...that sort of undermines the study deeply."<sup>3</sup>

NRC in the December 3 letter also requested NAS to spend more time on the study -in other words delay issuing any report and subsequent required remedial action. However, we know that terrorists will not necessarily wait until the NRC is ready.

We ask that NAS ignore the NRC and issue the report as required by Congress. We recognize that James Madison provided us with wise warning when he stated that "a popular government, without popular information, or the means of acquiring it, is but a prologue to a farce or a tragedy."

The NRC has shown itself time and time again to be a lapdog of the industry and that is precisely why Congress directed NAS, and not the NRC, to perform the analysis and issue the report.

We request that the public report be issued expeditiously and that it will contain enough information so that both the public and decision-makers can understand the vulnerability of spent fuel pools to attack, potential consequences and options to reduce vulnerability. Without this information, the will to require the necessary remedial action will not be mobilized. It will not become the national security priority issue that it deserves to be. We are confident that this can be done without compromising national security.

Why is this important? Nuclear reactors are terrorist targets and are vulnerable. Spent fuel pools are densely packed, vulnerable to attack, and if targeted the consequences horrific. Yucca Mountain may open anytime between 2015 and never; and it is estimated that waste generated nationally by 2013 will fill Yucca's maximum capacity. Hence, properly securing fuel on-site is a long-term concern. We are especially concerned about the vulnerability of BWR Mark I and

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<sup>2</sup> Reducing the Hazards from Stored Spent Power-Reactor Fuel in the United States by Alvarez, Beyea, Janberg, Kang, Lyman, Macfarlane, Thompson, von Hippel. *Science and Global Society*, 11:1-51, 2003

<sup>3</sup> U.S.NRC, Briefing On The Status Of Office Of research (RES) Programs, Performance, And Plans, March 27, 2003, page 44

Mark II reactors and feel that they should be prioritized. As you know, their spent fuel pools are high up in the main reactor building, outside primary containment, with a thin roof overhead – making them vulnerable from three sides.

Thank you for your consideration.

Sincerely,

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