

Dear Commissioners:

The Alliance for Nuclear Accountability (ANA) welcomes the opportunity to comment on the Blue Ribbon Commission's (BRC) draft report. However, we have been frustrated by the lack of representation on the Commission of tribes, public interest organizations, and longtime community advocates. We have expressed this concern from the beginning and suggested ways to correct the problems. Missing the input, knowledge and participation of people who have played active roles at DOE, civilian nuclear power, and commercial waste treatment and disposal sites has seriously compromised your efforts.

We have been troubled by the way the process for public participation and comment during the BRC meetings has grown less effective and useful for the Commission and the public. This meeting is yet another example. It is dominated by short presentations from elected officials who rise to make a statement, and the public participation is sharply curtailed. This is not an exchange of useful information, and does not benefit communication with the BRC or the public. Limiting public comment to three minutes is not an effective way for the BRC to listen to the concerns and input from community members who are most directly impacted by BRC recommendations.

**ANA recommendations to the Blue Ribbon Commission:**

- **Hardened On-Site Storage of spent nuclear fuel.**

ANA believes that nuclear waste should be stored as safely as possible as close to site of generation as possible in a manner that maximizes worker, public and environmental protection.

Page 49 of the BRC draft report states that "interim storage of substantial quantities of spent fuel at operating reactor sites can be expected to continue for some time". Therefore cooling pool density needs to be addressed. The BRC should recommend that the Nuclear Regulatory Commission (NRC) take action to get spent fuel out of cooling pools and into Hardened On-Site Storage (HOSS). HOSS is not just about preventing terrorism, as mentioned in the draft BRC report; it would also prevent much of the radioactive release in a catastrophe such as Fukushima. Let's move to HOSS now, before an accident occurs at a US cooling pool.

- **No Reprocessing of spent nuclear fuel.**

Despite more than 50 years of work, there is no solution to dealing with the millions of gallons of toxic waste generated by reprocessing. In 2009, the Government Accountability Office estimated that the costs to treat Hanford's reprocessing waste could well exceed \$100 billion over 80 years. This does not take into account the

estimated one million gallons of leaked reprocessed waste in the soil beneath Hanford's tanks.

Reprocessing is not a solution to the challenge of nuclear waste and should not be re-started in the U.S. We applaud the Commission for not recommending that the U.S. pursue reprocessing, but ask you to reject it more explicitly. Reprocessing is not recycling. Reprocessing creates new toxic waste streams and does not eliminate the long-term need for nuclear waste storage. Additionally, reprocessing is not a good economic choice. Reprocessing facilities around the world are closing (Sellafield, UK), relying on huge government subsidies (France), or failing to open at all (Rokkasho, Japan). Private investors are not interested in this technology and US taxpayers cannot afford to subsidize it.

- **No Centralized Interim Storage.**

Interim storage need not be consolidated. Shipping nuclear waste around the country is extremely expensive and creates unnecessary environmental and human health risks. Nuclear waste should only be moved for interim storage if it improves its safety. Otherwise, nuclear waste should not be moved unless it is bound for a permanent storage site. Operating reactors already have the level of security that HOSS would require.

Centralized storage also presents a problem of fairness. While the BRC "is not a siting commission," centralized storage will likely target communities already burdened with nuclear weapons waste. Most sites that have been considered for interim storage are in the Western portion of the country, while most of the spent fuel that they would accept comes from Eastern states. It is unfair for communities that have not generated nuclear waste to shoulder the weight of storing it for hundreds of thousands of years.

- **Do not expand the mission at the Waste Isolation Pilot Plant (WIPP) to include commercial waste.**

This would break promises made by Congress to New Mexico. DOE communities have been told for decades that WIPP is only for transuranic waste. People in the shadows of DOE nuclear weapons sites don't want more broken promises at any DOE site. Expanding the mission at WIPP would make it more difficult to find future disposal sites.

- **Nuclear Power**

It is irresponsible to recommend continued American reliance on nuclear power. The first step to solving the nuclear waste crisis is to stop making more waste. U.S. reactors should be closed as they reach the end of their original licenses.

- **Permanent Storage and Public Involvement**

Public involvement is key to siting and safely operating nuclear waste storage facilities. Nuclear waste storage should be a “science based” enterprise, but public acceptance is critical to a facility’s success. Public involvement should not end with siting – transparency and public oversight should be important aspects of the “new organization” that the BRC recommends take responsibility for long-term nuclear waste storage in the U.S.

ANA members across the country call on you to take these comments to heart, and we urge the Commission to offer more opportunities for public involvement at the upcoming meetings in Minneapolis, Atlanta, Boston, and Washington, DC.

Sincerely,