

June 29, 2006

Re: Oppose centralized “interim” surface storage for commercial nuclear waste in FY 2007 Energy and Water Appropriations bill

Dear Senate Appropriations Committee Member:

As national and local public interest organizations, we are writing to urge you to oppose the provision in the FY 2007 Energy & Water Appropriations bill that would allow the transport of commercial irradiated nuclear fuel on roads, rails, and waters across the U.S. in order to store these highly radioactive wastes at centralized “interim” 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 securing and leaving most of the waste stored at the reactor sites for the time being.

This proposal would give the U.S. Department of Energy (DOE) authority to site a waste dump within a state over the objections of the state and local governments. As we understand the provision, each state with nuclear reactors would have to designate a site or sites in that state for “interim” storage of irradiated fuel. The DOE would have the option to use the state designated sites, establish regional facilities, or a combination of both (a state would not host both a state and regional facility). Federally owned land, as well as private sites purchased from a willing seller, also could be designated as “interim” storage sites. This complicated siting process would be rushed to be completion in 270 days, precluding meaningful public participation.

- **Creating centralized 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.

- **Centralized “interim” storage would likely become indefinite storage.** Despite the claim that the 25 year licenses could not be extended, there is no viable plan for moving the waste somewhere else. Thus, “interim” storage sites at would become long-term “overflow parking” for high-level radioactive wastes with nowhere else to go. 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. Reprocessing technologies are more than 25 years away from commercialization, if they are ever developed. DOE officials have been very clear in their testimony to Congress that DOE does not know whether the necessary technologies for the proposed Global Nuclear Energy Partnership program, including reprocessing, fuel fabrication, and fast reactors, would ever work or be economically competitive.
- **Centralized “interim” storage would be 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 centralized “interim” surface storage 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,

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