



webserver@yucca-web.ymp.gov on 01/10/2008 09:04:48 PM

RRR000260

To: EIS_Comments@ymp.gov
CC:
Subject: EIS Comment

User Filed as: Not Categorized in ERMS

January 10, 2008 21:04:47

IP address: 71.191.118.227

The Commentors Name:

---> Mr. Kevin J Kamps

The Commentors Address:

---> 6930 Carroll Avenue, Suite 400
---> Takoma Park, Maryland 20912

Email Information:

---> kevin@beyondnuclear.org
---> Add commentor to the mailing list : yes

Contact Information:

---> fax number : 301 270 4000
---> phone number : 301 270 2209
---> organization : Beyond Nuclear
---> position : Radioactive Waste Watchdog

Comment Text :

--> Dear DOE EIS Office,

1 [Please include the following "Principles for Safeguarding Nuclear Waste at Reactors," endorsed by over 150 organizations, as an alternative to your currently proposed Yucca Mountain repository and its associated radioactive waste transportation risks.]

Sincerely,

Kevin Kamps
Radioactive Waste Watchdog
Beyond Nuclear
6930 Carroll Avenue, Suite 400
Takoma Park, Maryland 20912

Office phone: (301) 270-2209
Cell phone: (240) 462-3216
Fax: (301) 270-4000
kevin@beyondnuclear.org
www.beyondnuclear.org

First released: Sept. 13, 2006

Updated list of signatories: June 4, 2007

Principles for Safeguarding Nuclear Waste at Reactors

The following principles are based on the urgent need to protect the public from the threats posed

by the current vulnerable storage of commercial irradiated fuel. The United States does not have a

near-term solution for the permanent storage of high-level nuclear waste. The proposed Yucca

Mountain site is unsafe for geologic storage of nuclear waste and the program remains mired in bad

science, mismanagement, and yet another design overhaul. Even if licensed, Yucca Mountain could

not legally contain all of the waste produced by existing reactors. Under the U.S. Department of

Energy's unrealistically optimistic scenario, Yucca Mountain is not predicted to begin receiving

waste until at least 2017 and transporting waste to the site would take more than 30 years.

Meanwhile, irradiated fuel at reactor sites remains vulnerable to accidents and attacks.

The undersigned organizations' support for improving the protection of radioactive waste stored at

reactor sites is a matter of security and is in no way an indication that we support nuclear power and

the generation of more nuclear waste.

" Require a low-density, open-frame layout for fuel pools: Fuel pools were originally designed

for temporary storage of a limited number of irradiated fuel assemblies in a low density, open

frame configuration. As the amount of waste generated has increased beyond the designed

capacity, the pools have been reorganized so that the concentration of fuel in the pools is nearly

the same as that in operating reactor cores. If water is lost from a densely packed pool as the

result of an attack or an accident, cooling by ambient air would likely be insufficient to prevent

a fire, resulting in the release of large quantities of radioactivity to the environment. A lowdensity,

open-frame arrangement within fuel pools could allow enough air circulation to keep

the fuel from catching fire. In order to achieve and maintain this arrangement within the pools,

irradiated fuel must be transferred from the pools to dry storage within five years of being

discharged from the reactor.

" Establish hardened on-site storage (HOSS): Irradiated fuel must be stored as safely as

possible as close to the site of generation as possible. Waste moved from fuel pools must be

safeguarded in hardened, on-site storage (HOSS) facilities. Transporting waste to

interim away-from-reactor storage should not be done unless the reactor site is unsuitable for a

HOSS facility and the move increases the safety and security of the waste HOSS facilities must

not be regarded as a permanent waste solution, and thus should not be constructed deep

underground. The waste must be retrievable, and real-time radiation and heat monitoring at the

HOSS facility must be implemented for early detection of radiation releases and overheating.

The overall objective of HOSS should be that the amount of releases projected in even severe

attacks should be low enough that the storage system would be unattractive as a terrorist target.

Design criteria that would correspond to the overall objective must include:

- Resistance to severe attacks, such as a direct hit by high-explosive or deeply penetrating

weapons and munitions or a direct hit by a large aircraft loaded with fuel or a small aircraft

loaded with fuel and/or explosives, without major releases.

- Placement of individual canisters that makes detection difficult from outside the site

boundary.

" Protect fuel pools: Irradiated fuel must be kept in pools for several years before it can be stored

in a dry facility. The pools must be protected to withstand an attack by air, land, or water from a

force at least equal in size and coordination to the 9/11 attacks. The security improvements must

be approved by a panel of experts independent of the nuclear industry and the Nuclear

Regulatory Commission.

" Require periodic review of HOSS facilities and fuel pools: An annual report consisting of the

review of each HOSS facility and fuel pool should be prepared with meaningful participation

from public stakeholders, regulators, and utility managers at each site. The report must be made

publicly available and may include recommendations for actions to be taken.

" Dedicate funding to local and state governments to independently monitor the sites:

Funding for monitoring the HOSS facilities at each site must be provided to affected local and

state governments. The affected public must have the right to fully participate.

" Prohibit reprocessing: The reprocessing of irradiated fuel has not solved the nuclear waste

problem in any country, and actually exacerbates it by creating numerous additional waste

streams that must be managed. In addition to being expensive and polluting, reprocessing also

increases nuclear weapons proliferation threats.

Signatories (as of June 4, 2007):

National Organizations

Susan Gordon, Executive

Director

Alliance for Nuclear

Accountability

Lynn Thorp, National

Campaigns Coordinator

Clean Water Action

Ken Cook, Executive Director

Environmental Working Group
Erich Pica, Director, Domestic
Campaigns
Friends of the Earth
Jim Riccio, Nuclear Policy
Analyst
Greenpeace
Tom Reed
Program and Operations
Manager
Honor the Earth
Arjun Makhijani, Ph.D.,
President
Institute for Energy and
Environmental Research
Gretel Munroe, Board Member
The International Coalition to
Ban Uranium Weapons
Kevin S. Curtis
Senior Vice President for
Programs
National Environmental Trust
Geoffrey Fettus, Senior
Attorney
Natural Resources Defense
Council
Michael Mariotte, Executive
Director
Nuclear Information and
Resource Service

Alice Slater, Director, NY
Nickolas Roth, Research and
Advocacy Director
Nuclear Age Peace Foundation
Kevin Martin, Executive
Director
Peace Action
Kimberly Roberts, Director of
Policy and Programs, Security
Physicians for Social
Responsibility
Michele Boyd, Legislative
Director
Public Citizen
Stephen Lerner
Director, Property Services
Service Employees
International Union
Washington, D.C.
Dave Hamilton, Director,
Global Warming and Energy
Program
Sierra Club
Ken Bossong, Executive
Director
SUN DAY Campaign
3
David Lochbaum
Director, Nuclear Safety
Project
Union of Concerned Scientists

Anna Aurilio, Legislative
Director

U.S. PIRG (U.S. Public
Interest Research Group)

Susan Shaer, Executive
Director

Women's Action for New
Directions

Alabama

Kaye Kiker

Citizens Task Force

Arizona

Stephen Brittle, President

Don't Waste Arizona, Inc.

Donna Cassano, Board

Member

Flagstaff Activist Network

Jack & Felice Cohen-Joppa,

Editors

Nuclear Resister

Russell J. Lowes, Research

Director

Power Plant Analysts

Arkansas

April Ambrose, Executive

Director

Arkansas Earth Day

Foundation

California

Rochelle Becker, Executive

Director

Alliance for Nuclear

Responsibility

Pamela S. Meidell, Director

Atomic Mirror

Jon Rainwater, Executive

Director

California Peace Action

Enid Schreiber, Co- Director

Center for Safe Energy

Daniel Hirsch, President

Committee to Bridge the Gap

Molly Johnson, Area

Coordinator

Grandmothers for Peace, San

Luis Obispo County Chapter

Jennifer Viereck

HOME (Healing Ourselves &

Mother Earth)

Michael Welch

Redwood Alliance

Leuren Moret, Independent

Radiation Specialist

Environmental Commissioner

City of Berkeley

Radiation and Public Health

Project

Jill ZamEk and Jane Swanson

San Luis Obispo Mothers for

Peace Action Committee

Kathleen Gwynn

President & CEO

Steven and Michele Kirsch

Foundation

Linda Seeley, President

Terra Foundation

Marylia Kelley, Executive

Director

Tri-Valley CAREs

(Communities Against a
Radioactive Environment)

Colorado

Paula Palmer, Executive

Director

Global Response

LeRoy Moore, Ph.D.

Rocky Mountain Peace and

Justice Center

Connecticut

Jane Latus, Vice President

Canton Advocates for

Responsible Expansion

Lynn Johnson, President

Center for Serenity

Nancy Burton, Director

Connecticut Coalition Against

Millstone

Judi Friedman, Chair

PACE (People's Action For

Clean Energy)

Sal Mangiagli & Rosemary

Bassilakis

CT CAN

Florida

Bob Tancig, State Coordinator

Florida Coalition for Peace and
Justice

Georgia

Adele Kushner, Executive

Director

Action for a Clean

Environment

Bobbie Paul, Director

Atlanta WAND (Women's
Action for New Directions)

Abayomi Noibi, Ph.D.,

Executive Director

Environmental Community

Action, Inc. (ECO-Action)

Bob Darby, Coordinator

Food Not Bombs/Atlanta

Steve Leeper, Executive

Director

Global Peacemakers

Association

Glenn Carroll, Coordinator

Nuclear Watch South

4

Idaho

Jeremy Maxand, Executive

Director

Snake River Alliance

Illinois

David A. Kraft, Director
Nuclear Energy Information
Service (NEIS)

Carolyn Treadway

No New Nukes

Indiana

Grant Smith, Executive
Director

Citizens Action Coalition of
Indiana

Iowa

Merle P. Prater, Ph.D.

Founder/Principal
Integrative Educational
Systems

Kansas

James M Nordlund,
Communications Director
Kansas Chapter of the National
Action Network

Kentucky

Ruby English
Active Citizens for Truth
(ACT)

Mary Davis, Director
Yggdrasil, a project of Earth
Island Institute

Louisiana

Karen Wimpelberg, Board

President

Alliance for Affordable Energy

Nathalie Walker & Monique

Harden, Co-Directors

Advocates for Environmental

Human Rights

Maine

Bruce K. Gagnon, Coordinator

Global Network Against

Weapons & Nuclear Power in

Space

Maryland

Jay. J. Levy, chair

Nuclear Free Takoma Park

Committee

Massachusetts

Sandra Gavutis, Executive

Director

The C-10 Research and

Education Foundation

Deb Katz, Director

Citizens Awareness Network

Carol Dwyer, Co-Chair

Grassroots Actions for Peace

Mary Lampert, Director

Pilgrim Watch

Michigan

Keith Gunter

Citizens' Resistance at Fermi

Two

Michael J. Keegan

Coalition for a Nuclear Free
Great Lakes
Alice Hirt
Don't Waste Michigan
John Ephland
KNOW (Kalamazoo Nonviolent
Opponents of War)
Sarah Nash, Assistant to the
Coordinator
IHM Justice Peace and
Sustainability Office
Lynn Howard Ehrle, Chair
International Science Oversight
Board (a project of the Organic
Consumers Association)
Betsy Winkelman, Chair
Michigan Coalition on the
Environment and Jewish Life
(MI-COEJL)
Vicki Levengood, Michigan
Representative
National Environmental Trust
Minnesota
Judi Poulson, Chair
Fairmont Peace Group
Gladys Schmitz, SSND
Mankato Area
Environmentalist, Coordinator
George Crocker, Executive
Director

North American Water Office

Bruce A Drew, Steering
Committee

Prairie Island Coalition
Missouri

Kathleen Logan Smith,
Executive Director,
Missouri Coalition on the
Environment

Nebraska

Tim Rinne
Executive Director
Nebraskans for Peace

Nevada

Peggy Maze Johnson,
Executive Director
Citizen Alert

Tony Guzman, Outreach
Director

Nevada Conservation League

Judy Treichel, Executive
Director

Nevada Nuclear Waste Task
Force

5

New Hampshire

Chris Nord

NH CAN

New Jersey

Norm Cohen, Executive
Director

Coalition for Peace and Justice

UNPLUG Salem Campaign

New Mexico

Joni Arends, Executive

Director

Concerned Citizens for Nuclear

Safety

Jay Coghlan, Director

Nuclear Watch of New Mexico

Don Hancock, Director,

Nuclear Waste Safety Program

Southwest Research and

Information Center

New York

Tim Judson

Central New York CAN

Elaine Donovan, Co-Founder

Concerned Citizens for Peace

Scott Cullen, Senior Policy

Advisor

GRACE (GrassRoots Action

Center for the Environment)

Jason K. Babbie, Senior

Environmental Policy Analyst

NYPIRG - New York Public

Interest Research Group

Ernest J. Sternglass, Ph.D.,

President

Radiation and Public Health

Lisa Rainwater, Ph.D., Indian

Point Campaign Director

Riverkeeper

North Carolina

Louis Zeller, Campaign

Coordinator

Blue Ridge Environmental

Defense League

(also in SC, TN & VA)

Jim Warren, Executive

Director

NC WARN (North Carolina

Waste Awareness & Reduction

Network)

E.M.T. O'Nan, Director

Protect All Children's

Environment

Lewis E. Patrie, M.D., Chair

Western North Carolina

Chapter

Physicians for Social

Responsibility

Laura Sorensen, District

Leader

Western North Carolina Peace

Keepers

Ohio

Mark D. Stansbery, Secretary

Community Organizing

Center/For Mother Earth

Lisa Crawford, President

Fernald Residents For

Environmental Safety &

Health, Inc. (FRESH)

Vina Colley, Co-Chair

National Nuclear Workers for
Justice

Vina Colley and Lorry Swain

PRESS (Portsmouth/Piketon

Residents for Environmental
Safety and Security)

Oregon

Chuck Johnson, Board

Member

Center for Energy Research

Paige Knight, President

Hanford Watch

Gerald Pollet, JD, Executive
Director

Heart of America Northwest

(also in Washington)

Pennsylvania

Dr. Lewis Cuthbert, President

Alliance For A Clean

Environment

Karen H. Prather, Chair

Concern About Radiation In
the Environment (CARIE)

Ernest Fuller, Vice-Chairman

Concerned Citizens for SNEC

Safety (CCSS)

Eric Epstein, Coordinator

EFMR Monitoring

Eric Epstein, Chairman

TMI-Alert

South Carolina

Louis Zeller, Campaign

Coordinator

Blue Ridge Environmental

Defense League

(also in NC, TN & VA)

Ruth Thomas, President

Environmentalist Inc.

Susan Corbett, Conservation

Chair

SC Sierra Club

Tennessee

Louis Zeller, Campaign

Coordinator

Blue Ridge Environmental

Defense League

(also in North Carolina, South

Carolina & Virginia)

Ann Harris, Director

We the People, Inc.

6

Texas

Lisa Doggett (MD, MPH)

Austin Physicians for Social

Responsibility

Richard Simpson, Executive

Director

La Paz Coalition

Doris Smith

Panhandle Area Neighbors and

Landowners

Utah

Vanessa Pierce, Director

HEAL Utah

Pete Litster, Executive Director

Eileen McCabe, Associate

Director

Shundahai Network

Vermont

Chris Willams

VT CAN

Virginia

Louis Zeller, Campaign

Coordinator

Blue Ridge Environmental

Defense League

(also in NC, SC & TN)

Elena Day, Founding Member

People's Alliance for Clean

Energy (PACE)

Washington

Gerald Pollet, JD, Executive

Director

Heart of America Northwest

(also in OR)

Tom Carpenter, Director,

Nuclear Oversight Program

Government Accountability

Project

Wisconsin

Dennis Dums, Research

Director

Citizens Utility Board

John LaForge, Co-director

Nukewatch

George Paz Martin, Program

Director

Peace Action Wisconsin

Amy Schulz, RN, President

Physicians for Social

Responsibility Wisconsin

Judy Miner, Office Coordinator

Wisconsin Network for Peace

and Justice

Al Gedicks, Executive

Secretary

Wisconsin Resources

Protection Council

For more information, contact Kevin Kamps at Beyond Nuclear,
kevin@beyondnuclear.org or 301-270-2209.
