



NUCLEAR SECURITY COALITION

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Alliance for Nuclear Responsibility
C-10
Cape Downwinders
Citizens Awareness Network
Citizens Campaign for the Environment
Citizens' Environmental Coalition
Citizens' Regulatory Commission
Citizens Resistance at Fermi II
Clean Water Action
Connecticut Coalition Against Millstone
Earth Care
EFMR Monitoring
Environmental Coalition on Nuclear Power
Finger Lakes Citizens for the Environment
Georgians Against Nuclear Energy
Greenpeace
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Activism Network
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Justice Through Peace Initiative
Kids Against Pollution
Lakeshore Environmental Action
Massachusetts Citizens Awareness Network
Massachusetts Public Interest Research Group
Nebraskans for Peace
New England Coalition on Nuclear Power
New Jersey Public Interest Research Group
North American Water Office
New York Public Interest Research Group
North Carolina Waste Awareness & Reduction
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Physicians for Social Responsibility
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Plymouth County Nuclear Information Committee
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San Luis Obispo Mothers for Peace
Sierra Club
Southern Alliance for Clean Energy
Syracuse Peace Council
Three Mile Island Alert
Union of Concerned Scientists
UNPLUG Salem
Vermont Citizens Awareness Network

September 7, 2006

Dear Honorable Member of Congress,

Congress has the opportunity – and responsibility – to implement safeguards that address the most vulnerable and dangerous security threat on U.S. soil – the practice of storing highly radioactive used fuel rods from commercial nuclear power reactors in *spent-fuel pools*.^{*} If any one of the many spent-fuel pools in the United States is breached through terrorist attack or any other activity, truly catastrophic health, environmental, and economic consequences could result. Five years after the September 11 attacks, this severe security threat still has not been sufficiently addressed by the American government.

In 2005, the National Academies of Science (NAS) promulgated recommendations for securing spent-fuel storage facilities in a report to Congress. Although it requested the NAS study, Congress has yet to act on these critical recommendations. Congress owes it to the American people to take action on the safeguarding recommendations detailed by NAS.

Central to the protective actions recommended by NAS is the concept of a passive, dispersed, dry-cask storage system in which each cask stores only a small amount of the highly radioactive spent fuel (thus less fuel is at risk in a terrorist attack), an inherent security advantages over pool storage. This recommendation must be expanded to require a robust, hardened on-site storage system (HOSS) for spent fuel as an essential protective measure.

The NAS provided clear recommendations in their report for securing spent fuel storage facilities. Changes recommended by NAS must be enacted by the Nuclear Regulatory Commission (NRC). Accordingly, it is imperative that Congress direct the NRC to do the following:

- Enact the NAS recommendations to include the equipment of spent-fuel pools with low- density racks and the storage of the remaining spent fuel in dispersed and hardened dry casks at each plant site, as a critical and immediate safer interim measure to reduce risk.
- Establish a panel under the Federal Advisory Committee Act that includes NRC, the Department of Energy, and community and public interest group stakeholders charged with determining the most appropriate risk management plan for spent fuel at each nuclear plant site.
- Upgrade the NRC's "Design Basis Threat"(DBT) to meet the requirements of the Atomic Energy Act, which prohibits the consideration of cost in establishing minimum safety and security standards. The NRC's current DBT is based in part on "a

determination as to the attacks against which a private security force could reasonably be expected to defend”. Public safety and security must be based on what is necessary. Congress must insist that the DBT be based on an objective standard that is related to the expected characteristics of the adversary.

The information presented within the attached 13-minute CD explains in layman’s language both the magnitude of the threat posed by spent-fuel pools and the protective technologies needed.

We appreciate your attention to the very time-sensitive spent-fuel danger. Congress owes it to the American people to take action on safeguarding the nation’s spent fuel at reactor sites.

For additional information, please contact the C-10 Research and Education Foundation at spentfuelstorage@c-10.org or 978-465-6646.

Sincerely,

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Gordon Thompson, Director, Institute for Resource & Security Studies
Jim Warren, Executive Director, North Carolina Waste Awareness & Reduction Network
Lisa Rainwater PhD., Indian Point Campaign Director, Riverkeeper Inc.
Sara Baczak, Safe Energy Director, Southern Alliance for Clean Energy
Tim Judson, Board Member, Central New York, Citizen’s Awareness Network
Glenn Carroll, Coordinator, Nuclear Watch South
Vicki Baker, Chair, People’s Environmental Network of New York

* Most spent fuel rods from commercial nuclear power reactors are stored in large pools that are cooled by circulating water. If a spent-fuel pool is breached and cooling water is lost for any reason (terrorism, accident, sabotage, natural disaster, etc.), the stored rods could overheat, resulting in the release of radioactive materials. Depending on the event, the release could cause death and injury and could leave the area uninhabitable.