

**Summary Notes - July 15, 2013**  
**SRS Citizens Advisory Board**  
**Waste Management Committee Meeting**

The Savannah River Site (SRS) Citizens Advisory Board (CAB) Waste Management (WM) Committee held a meeting on Monday, July 15, 2013, from 6:00-7:50 p.m., at the DOE Meeting Center in Aiken, SC. It was also streamed online via Google Hangouts.

The purpose of this meeting was to receive an update was to determine the CAB's opinion on two versions of a Position Statement. There was also time set aside for committee discussion and public comments.

**Attendees:**

**CAB Members:**

Ed Burke- WM Chair  
Earl Sheppard- WM Vice Chair  
Dr. Donald Bridges- CAB Chair  
Harold Simon- CAB Vice Chair  
Dr. Rose Hayes  
Louie Chavis- *Online*  
Kathe Golden- *Online*  
Marolyn Parson- *Online*  
Artisha Bolding- *Online*

**DOE/Contractors/ Others:**

Terry Spears, DOE-SR  
Bill Taylor, DOE-SR  
Gerri Flemming, DOE-SR  
Tony Polk, DOE-SR  
Larry Ling, SRR  
Josh Seigler, SRR  
Ashley Whitaker, NOVA  
James Tanner, NOVA  
Jesslyn Anderson, NOVA

**Stakeholders:**

Frances Close	Gerald Rudolph	John Michael
Tom Cements	Ann Timberlake	Bernice Howard
Susan Corbett	Jos Podesta	Carter Thomas
Stan Howard	Monika Podesta	Dawn Gillas
Tedda Howard	Bill Collins	Betsy Rivard
Chris Cherry	Beverly Collins	Peggy Gasnor
Pamela Greenlaw	Ben Wislinski	Susan Wood
Chris Hall	Suzanne Rhodes	Bill Bobo
Louisa Davidson	Mike Simmons	Mary Lyons
Elaine Cooper	JoAnn Glass	Laura Witham
Charles Munns	Tom Coleman	Ron Schroder
Ernest Chaput	Marilyn Blanchard	Michael Gilles
Brenda Conway	Joanne Hagler	Wilkins Byrd
Jim Tisaranni	Brittany Williamson	Ron Feller
Steve Geddes	CeeCee Anderson	
Joanne Williams	Tom Howell	
Cassandra Fralix	Courtney Hanson	
Marie Craig	Suzanne Ruplin	
Michael Aiken	Yiven Bibler	
Ned Bibler	Jan Feller	

**Welcome and Introduction:**

CAB member Ed Burke opened the meeting by welcoming everyone. He said the purpose of holding the “special meeting” was to determine the CAB's opinion on two versions of a Position Statements he and CAB Chair Don Bridges wrote on the possible interim storage of commercial nuclear waste at SRS. He explained that the meeting also enabled other CAB members, not only the WM Committee, to provide input on each Position Statement.

CAB member Burke explained that he would discuss “Version A” of the Position Statement, while CAB Chair Bridges would discuss “Version B.” He stated after everyone had an opportunity to discuss the different Position Statements, there would be a poll of the CAB members to determine which Position Statement would be taken to the July Full Board meeting. CAB member Burke allowed CAB Chair Bridges to provide an overview of his version of the Position Paper.

**Discussion of Position Statement “Version B” by CAB Chair Don Bridges:**

CAB Chair Bridges stated he supported “Version B” of the Position Statement, and explained it “did not propose bringing Spent Nuclear Fuel (SNF) to SRS;” however, this version acknowledged that in the future, the CAB might object to such a proposal. He said the CAB should not act prematurely towards current or future nuclear materials coming to SRS and said DOE had not developed a proposal for interim storage at SRS. He explained that SRS had

a reputation of being supportive of nuclear program within the DOE complex and continued to be a key economic factor in the growth of the surrounding community. He listed various community organizations he felt would not support the proposal since the organizations greatly supported local employment. He said the CAB should not support a Position Statement that ruled out possible interim storage because the decision could create a negative impression of SRS, discard the CAB's role in the process before all potential incentives were assessed, and would be out of step with other organizations. CAB Chair Bridges encouraged the CAB not to act prematurely by closing the door on any future opportunities before all information about the program was offered. He also briefly discussed the concerns DOE should address if SRS was chosen as a future location for interim storage; he said the CAB desired to be a part of the consent-based process and asked DOE to address each concern in a manner that would convince the public that interim storage was worthy of further consideration at SRS. He introduced CAB member Burke and CAB member Hayes to begin the discussion of "Version A."

#### **Discussion of Position Statement "Version A" by CAB member Ed Burke:**

CAB member Burke stated he was pleased with the amount of input the CAB had received from the community before allowing CAB member Hayes to provide input on "Version A" of the Position Statement. She discussed various economic issues that could occur if SRS was selected as an interim storage facility. CAB member Burke reviewed "Version A" of the Position Statement, which opposed the use of SRS as an interim storage site for spent nuclear fuel. He said there was not a geologic site better than Yucca Mountain and the reopening of the repository selection process would be very expensive. He also mentioned the future completion of a new repository was generations away, which left no reason for the CAB to believe that the 2048 availability date would be adhered to. His last reason for being opposed was that future generations would not benefit from not knowing how long SRS planned to serve as an interim storage facility for commercial nuclear waste. CAB member Burke explained that "Version A" was not opposed to "commercial nuclear power generation." He said he was not concerned that DOE would initiate a program that anticipated the unsafe storage of nuclear waste at SRS." CAB member Burke allowed CAB members to provide input on both versions, A and B of the Position Statement.

#### **Committee Discussion:**

CAB member Earl Sheppard stated he read both versions of the Position Statement and he supported Version A. CAB member James Streeter said he supported the community involvement, which helped him make his final decision about which position he wanted to support. CAB member Marolyn Parson stated she was opposed to commercial spent nuclear fuel coming to SRS; however, she felt her position on commercial nuclear power was irrelevant as a CAB member, which she thought, was not an appropriate statement to have in the Position Statement. CAB member Kathe Golden said she supported the Position Statement that opposed SNF coming to SRS. CAB member Artisha Bolding stated she opposed the use of SRS as an interim repository since it would become a lengthy program, which would use more of the United States dollars. CAB member Louie Chavis thanked everyone for the input; however, at that time, he was unable to decide which version of the Position Statement he wanted to support. CAB member Burke then allowed members of the public to provide input on the two Position Statements.

#### **Public Comment**

Mr. Stan Howard, public, listed several reasons why he felt SRS was capable of being an interim storage facility for the nation's nuclear waste. He encouraged the CAB to look at the possibilities before making a decision. A copy of his comment has been attached to this document.

Mr. Ernie Chaput, public, recommended that the CAB defer any action regarding acceptance or rejection of a "back end of the fuel cycle" program until a specific proposal was brought forward and analyzed. He also stated that if deferral was not acceptable then the CAB should support a program only if the state and local benefits exceed state and local risks. A copy of his comment has been attached to this document.

Ms. Elaine Cooper, public, stated the future federal budget would no longer support SRS, and encouraged the CAB to vote against SNF coming to SRS.

Mr. Chris Hall, Sierra Club, stated he did not consent to SNF coming to Aiken, South Carolina. He stated that at the May Full Board meeting, CAB Chair Bridges removed the recommendation from being voted on. CAB member Burke explained that he was not present at the May Full Board Meeting and said the recommendation was never intended to be voted on at the May Full Board meeting.

Ms. Frances Close, Friends of the Earth, stated back in the 1980's, a proposal entitled "Away From Reactor Storage" (AFR) was developed in regards to nuclear waste. She explained that the old proposal dealt with the same waste the CAB was discussing. She stated that she could not imagine anything that would make it acceptable for the SNF to come to SRS.

Mr. Tom Clements, Friends of the Earth, stated that a proposal was on the table to bring SNF to SRS made by SRS Community Reuse Organization (CRO), which presented a document in April to bring SNF to SRS and begin reprocessing. He also explained legislators recently released legislation that called for establishing one or more interim storage facilities. He encouraged the CAB to continue making progress on opposing interim storage at SRS.

Ms. Susan Corbett, Sierra Club, she stated she supported the CAB for being ahead of the legislators on the consent-based process by opposing interim storage. She stated transporting 70,000 tons of SNF through various communities was a "bad idea."

Ms. Ann Timberlake, Conservation Voters of South Carolina, thanked the CAB for backing the issue. She said that the issue was not about being "pro or anti-nuclear" because the local community had a record to be proud of. She said this was not about negotiating or leveraging terms, it was about being realistic and having the courage to say there is no deal "sweet enough" to let the community become Yucca Mountain. She stated that the rule with nuclear waste is that it should stay where it is put and the CAB had a right to say, we don't want it to stay in South Carolina.

Mr. Ron Schroder, public, stated he did not attend the meeting to discuss the pros and cons of bringing SNF to SRS because he felt "it was not the proper venue to have the conversation." He stated he had a copy of the CAB charter and mission statement and since commercial used nuclear fuel was not a current DOE program, he questioned the motives of the CAB.

Ms. Pamela Greenlaw, public, encouraged the CAB to choose "Version A" and thanked the CAB for being open with the public.

Ms. Brittany Williamson, public, stated she researched the transportation processes of relocating any type of SNF. She said the casks had to undergo rigorous testing and meet several qualifications to transport the waste and stated that interim storage seemed to be safe.

Ms. Marie Craig, public, stated she opposed SNF coming to SRS because the waste was a poison and SRS did not have the technology to clean it up.

Ms. Suzanne Rhodes, League of Women Voters of South Carolina, stated if SRS accepted the "orphan waste" the Blue Ribbon Commission (BRC) said should be sent to interim storage first, the curie count at SRS would triple. A copy of her comment has been attached to this document.

Ms. Cassandra Fralix, public, stated she agreed with the Position Statement and thanked the CAB for allowing the public to provide input on the topic. She said she hoped the CAB chose "Version A" as the best option.

Mr. Bill Collins, public, stated he felt interim storage could be done safely at SRS; however, Yucca Mountain was the best place for the nuclear waste.

Ms. Beverly Collins, public, stated she felt the CAB and public should try to get Yucca Mountain back on the table for being a possible interim storage location.

Mr. Charles Munns, public, suggested that the CAB should become part of the consent-based process by requesting DOE to define what the CAB should do to ensure the board was included within the consent-based approach. He said it was premature to draw a red line without fully grasping the risks and gains of government proposals. He asked the CAB to take a broader view about consolidated interim storage. A copy of his comment has been attached to this document.

Mr. Clint Wolfe, Citizens Nuclear Technology Awareness (CNTA), commented on the variety of opinions shared at the meeting and encouraged CAB members not to make a final decision on interim storage at SRS this early in the process.

Ms. Dawn Gillas, public, stated she supported "Version B." She said since there was a diverse group of opinions, the CAB should not make any decision about interim storage of SNF.

Ms. Susan Wood, public, stated it was too early to make a decision on the issue of interim storage; however, she supported "Version B" since several aspects of the local economy occurred due to the efforts at SRS.

Mr. Bill Bobo, public, stated he supported "Version B," and mentioned how he hoped government officials would begin locating another permanent repository.

Ms. Clara Delbert, public, stated she was concerned that more Georgia residents did not attend the meeting.

Mr. John Michael, GAWAND, stated he opposed of SNF and felt the nuclear waste would never leave SRS.

Mr. Claude Howard, public, stated he was opposed to interim storage at SRS because it was unknown how long the SNF would remain.

Mr. Tom Howell, public, stated it was difficult to predict natural occurrences such as earthquakes, which made it even more concerning to bring more nuclear waste to SRS. He said he opposed nuclear waste coming to SRS.

Ms. Tedda Howard, public, said that SNF coming to SRS could provide more knowledge for the nuclear industry across the nation. She encouraged the CAB to make decisions based on technologies, not emotions.

Ms. Courtney Hanson, GAWAND, thanked the WM Committee for proposing the recommendation and said the recommendation was not shortsighted, since there were dozens of people from Georgia and South Carolina who thought bringing the nuclear waste to SRS would not benefit the community.

Mr. Carter Thomas, public, stated he supported "Version A."

#### **Final Polling on Position Statements:**

Position Statement "Version A" received 12 votes and "Version B" received 10 votes. CAB member Burke's Position Statement would go forward to be discussed by the Boars at the July Full Board Meeting.

Both versions of the Position Statement are attached to this document.

CAB member Burke adjourned the WM Committee meeting.

**The next WM Committee Meeting will be held on Tuesday, August 27, 2013, from 6:00-7:50 p.m., at the DOE Meeting Center in Aiken, SC.**

**The online recording of this meeting can be located on the CAB's website at: [cab.srs.gov](http://cab.srs.gov)**

## VERSION A

### Position Paper for the Savannah River Site's Citizens Advisory Board On Using SRS for interim Storage of Used Nuclear Fuel

**This is a draft document for committee discussion**

In 1945 the nuclear age began with the first manmade nuclear explosion at White Sands, New Mexico late in Second World War. By 1958 the technology had progressed from the bomb to power generation with the first commercial nuclear power plant opening in Shippingport, PA.

The Savannah River Site began operations in 1952 and has continued until today successfully pursuing various missions including heavy water production, plutonium/uranium separation, and the production of isotopes required for the space exploration program. Current missions include vitrification and storage of spent reactor fuel and other wastes for eventual disposal in a deep geologic repository and a new mission to convert plutonium nuclear bombs to fuel for commercial nuclear reactors in the Mixed Oxide (MOX) program. In 1981, an environmental remediation program was begun to clean-up the environmental contamination of the site created by earlier missions. The clean-up mission included safely decontaminating and decommissioning unneeded equipment and processing the contents in to a safe state a safe state for disposal in a repository.

By the 80's it was recognized that the safe disposal of nuclear wastes from both commercial and defense sources was a national priority. The Nuclear Waste Policy Act (NWPA) of 1982, created a timetable for the creation of a permanent underground repository. The permanent repository was slated to begin receiving commercial and defense wastes by the middle of the next decade. The responsibility to site, construct and operate the repository was given to the Department of Energy (DOE). A fee was imposed on nuclear power generators to support the creation and operation of the repository.

The NWPA called for DOE to make recommendations, by 1987, for two deep geologic repositories. In 1987 the act was revised to require DOE to consider only Yucca Mountain as the repository site. In 2002 President Bush designated Yucca Mountain as the repository site and, by 2004, all legal channels for overturning the decision had been exhausted. Work to license the site began.

In 2010 President Obama ordered work on the licensing process for Yucca Mountain to cease and all funding for licensing was withdrawn. No scientific or safety reasons were given. The decision was described by the General Accounting Office (GAO) as a political decision.

President Obama created and tasked a Blue Ribbon Commission on America's Nuclear Future (BRC) to find alternatives to Yucca Mountain. The BRC issued its final report in 2012, including among its recommendations:

- a. The United States should proceed promptly to develop one or more consolidated storage facilities as part of an integrated, comprehensive plan for safely managing the back end of the nuclear fuel cycle. An effective integrated plan must also provide for the siting and development of one or more disposal facilities.

- b. Ensure that all near-term forms of storage meet high standards of safety and security for the multi-decade-long time periods that they are likely to be in use; active research should *continue* on issues such as degradation phenomena, vulnerability to sabotage and terrorism, full-scale cask testing, and other matters.
- c. The processes used to develop and implement all aspects of the spent fuel and waste management system should be science-based, consent-based, transparent, phased, and adaptive. They should also include a properly designed and substantial incentive program
- d. The United States should undertake an integrated nuclear waste management program that leads to the timely development of one or more permanent deep geological facilities for the safe disposal of spent fuel and high-level nuclear waste

The nation now finds itself in a situation where the Blue Ribbon Committee is recommending that the nation promptly proceed to commence consolidated interim storage designed for multi-decade use. The program to develop a permanent, deep geologic disposal facility is only to be developed on a "timely" basis. The 2013 DOE response to the BRC recommendations, Strategy For The Management And Disposal Of Used Nuclear Fuel and High-Level Radioactive Waste, states that over the next ten years the Administration currently plans to implement a program that "Makes demonstrable progress on the siting and characterization of repository sites to facilitate the availability of a geologic repository by 2048".

The need to have a deep geologic repository was identified in the 1982 NWPA and the initial target date to begin accepting wastes was 1995. At the time president Obama took office (2009), the opening date for the repository had already been delayed until 2022. No progress on developing a repository has been made during the subsequent four years, despite the Congressional Act requiring the development of a deep geologic repository much earlier. This delay of more than two decades is not unprecedented for projects managed by the Department of Energy.

The Salt Waste Processing facility currently under construction at SRS was approved in 2001 with an initial completion date of 2009. Recently the completion date was moved from 2015 to 2018 and this date is in question. This delay is despite an enforceable agreement with the State of South Carolina that requires the facility to be completed by 2015. The Mixed Oxide Fabrication Facility was approved in 1999 with a completion date of 2007. Current projected completion date is 2018 and this date is questionable. In addition to being well behind schedule, these projects are billions of dollars over the original cost estimates.

There is no data supporting an assumption that a repository superior to Yucca Mountain will ever be identified. In addition, the \$13 billion dollars already spent to build the Yucca Mountain facility will be totally lost if a different site is selected. Considering the current national debt and budget deficit, it is unlikely that adequate funding will be available. Finally it is reasonable to assume, based on the DOE's track record, that there is no commitment to a date now 35 years in the future and even congressional mandates and enforceable agreements with the states will not force DOE to meet their commitments.

The Savannah River Site Specific Advisory Board would like to make clear that:

- a. They are not opposed to commercial nuclear power generation.
- b. They are not concerned that the DOE would initiate a program that anticipated the unsafe storage of nuclear waste at SRS

The reasons for the CAB's opposition are:

1. The belief that no site for a long term geologic site superior to Yucca Mountain exists and any alternative site will be technically inferior.
2. The reopening of the repository selection process and, as a consequence, creation of interim storage sites will be a very costly endeavor in a time when the nation does not have the financial resources.
3. The completion of a new repository is generations away and there is no reason to believe the currently proposed 2048 availability date will be adhered to.
4. Future generations of South Carolinians and Georgians will not be well served by having the Savannah River Site become an interim storage site for commercial nuclear waste, and for what will be an undetermined length of time.

The Savannah River Site Citizen's Advisory Board wants the Department of Energy to know that is opposed the use of SRS as a site for interim storage of spent nuclear fuel from commercial nuclear reactors.

**VERSION B****Savannah River Site Citizen's Advisory Board Position Statement on:  
Use of SRS for Interim Storage of Commercial Used Nuclear Fuel  
June 25, 2013**

**This is a draft document for committee discussion**

**Overview:** The SRS Citizen's Advisory Board (CAB) has for some time had a concern about the future of the Site as relates to the potential for storage of Commercial Used Nuclear Fuel at the Site. The Blue Ribbon Commission on America's Nuclear Future has recommended a program for dealing with Commercial and Defense-related Used Nuclear Fuel that involves somewhat of a two-step process for dealing with the nation's Used Nuclear Fuel that includes: 1. An interim storage concept that consolidates such Nuclear Fuel from many sites into one or more consolidated storage sites for what appears to be a timeframe of more than 30 years. 2. A final disposition program for the Commercial Used Nuclear Fuel in a geological repository that would not likely be available prior to the 2050 timeframe.

In the view of the CAB the SRS appears to be a logical candidate for the interim storage role. While planning for this activity is at an early and very formative stage (and certainly no SRS-specific planning has been identified) the CAB would like to go on the record to express some of our views and concerns on this issue. This issue has been brought to the fore by many interested citizens and organizations and we feel it would be helpful to provide some perspective on this topic even at a very early stage.

Following will include some background discussion followed by our views and thoughts.

**Background:** In 1945 the nuclear age began with the first manmade nuclear explosion at White Sands, New Mexico late in Second World War. By 1958 the technology had progressed from the bomb to power generation with the first commercial nuclear power plant opening in Shippingport, PA.

The Savannah River Site began operations in 1952 and has continued until today successfully pursuing various missions including heavy water production, plutonium/uranium separation, and the production of isotopes required for the space exploration program. Current missions include operation of the Savannah River National Laboratory, storage of spent reactor fuel, and treatment of nuclear wastes for eventual disposal in a deep geologic repository and a new mission to convert plutonium (formerly planned for nuclear bombs) to fuel for commercial nuclear reactors in the Mixed Oxide (MOX) program. In 1991, an environmental remediation program was begun to clean-up the environmental contamination of the site created by earlier missions. The clean-up mission included safely decontaminating and decommissioning unneeded equipment and processing the contents in to a safe state for disposal in a repository.

By the 80's it was recognized that the safe disposal of nuclear wastes from both commercial and defense sources was a national priority. The Nuclear Waste Policy Act (NWPA) of 1982, created a timetable for the creation of a permanent underground repository. The permanent repository was slated to begin receiving commercial and defense wastes by the middle of the next decade. The responsibility to site, construct and operate the repository was given to the Department of Energy (DOE). A fee was imposed on nuclear power generators to support the creation and operation of the repository.

The NWPA called for DOE to make recommendations, by 1987, for two deep geologic repositories. In 1987 the act was revised to require DOE to consider only Yucca Mountain as the repository site. In 2002 President Bush designated Yucca Mountain as the repository site and, by 2004, all legal channels for overturning the decision had been exhausted. Work to license the site began.

In 2010 President Obama ordered work on the licensing process for Yucca Mountain to cease and all funding for licensing was withdrawn. No scientific or safety reasons were given. The decision was described by the General Accounting Office (GAO) as a political decision.

President Obama created and tasked a Blue Ribbon Commission on America's Nuclear Future (BRC) to find alternatives to Yucca Mountain. The BRC issued its final report in 2012, including among its recommendations:

- a. The United States should proceed promptly to develop one or more consolidated storage facilities as part of an integrated, comprehensive plan for safely managing the back end of the nuclear fuel cycle. An effective integrated plan must also provide for the siting and development of one or more disposal facilities.
- b. Ensure that all near-term forms of storage meet high standards of safety and security for the multi-decade-long time periods that they are likely to be in use; active research should continue on issues such as degradation phenomena, vulnerability to sabotage and terrorism, full-scale cask testing, and other matters.
- c. The processes used to develop and implement all aspects of the spent fuel and waste management system should be science-based, consent-based, transparent, phased, and adaptive. They should also include a properly designed and substantial incentive program
- d. The United States should undertake an integrated nuclear waste management program that leads to the timely development of one or more permanent deep geological facilities for the safe disposal of spent fuel and high-level nuclear waste.
- e. The concept of "A New Consent-Based" approach to Siting that encouraged involvement of all levels of affected governments including state and tribal authorities, regional and local authorities, and host communities. It was noted in the report the difficulty of attaining local support for any such projects and it was pointed out that the siting process should include a flexible and substantial incentive program at the local level.

#### **SRS CAB Discussion of Concerns**

1. **Any Interim storage at SRS is likely to be far in excess of 30 years since planning for final disposition is uncertain and subject to innumerable time delays.**

The nation now finds itself in a situation where the Blue Ribbon Committee is recommending that the nation promptly proceed to commence consolidated interim storage designed for multi-decade use. The program to develop a permanent, deep geologic disposal facility is only to be developed on a "timely" basis. The 2013 DOE response to the BRC recommendations, *Strategy For The Management And Disposal Of Used Nuclear Fuel and High-Level Radioactive Waste*, states that over the next ten years the Administration currently plans to implement a program that "Makes demonstrable progress on the

siting and characterization of repository sites to facilitate the availability of a geologic repository by 2048”.

The need to have a deep geologic repository was identified in the 1982 NWPAA and the initial target date to begin accepting wastes was 1995. At the time president Obama took office (2009), the opening date for the repository had already been delayed until 2022. No progress on developing a repository has been made during the subsequent four years, despite the Congressional Act requiring the development of a deep geologic repository much earlier. This delay of more than two decades is not unprecedented for projects managed by the Department of Energy.

**The completion of a new repository is generations away and there is no reason to believe the currently proposed 2048 availability date will be adhered to.**

2. **DOE has a poor record in dealing with project schedules and meeting budget estimates even for high priority projects. This concern is simply stated by noting that DOE and the US government in general have credibility issues.**

The Salt Waste Processing facility currently under construction at SRS was approved in 2001 with an initial completion date of 2009. Recently the completion date was moved from 2015 to 2018 and this date is in question. This delay is despite an enforceable agreement with the State of South Carolina that requires the facility to be completed by 2015. The Mixed Oxide Fabrication Facility was approved in 1999 with a completion date of 2007. Current projected completion date is 2018 and this date is questionable. In addition to being well behind schedule, these projects are billions of dollars over the original cost estimates.

**Future generations of South Carolinians and Georgians will not be well served by having the Savannah River Site become, in effect, a permanent storage site for spent nuclear reactor fuel from all over the United States.**

3. **It is not clear to the CAB that a repository location that is technically superior to Yucca Mountain exists and will be identified**

There is no data supporting an assumption that a repository superior to Yucca Mountain will ever be identified. In addition, the \$13 billion dollars already spent to build the Yucca Mountain facility will be totally lost if a different site is selected. Considering the current national debt and budget deficit, it is unlikely that adequate funding will be available. Finally it is reasonable to assume, based on the DOE's track record, that there is no commitment to a date now 35 years in the future and even congressional mandates and enforceable agreements with the states will not force DOE to meet their commitments. **Our view is that no site for a long term geologic site superior to Yucca Mountain exists and any alternative site will be technically inferior.**

4. **An early step as outlined by the Blue Ribbon Committee will be to determine the parameters and methodologies of a Consent-Based Approach. We strongly encourage DOE to ask for communities and the public “at large” to help define the process.**

The CAB is ideally situated to provide input (along with local governments and interested groups) to define the process which should be used to determine what “consent-based” means, how consent-

based will be determined, and what consideration will be given to a region's "consent-based" determination. DOE is encouraged to seek input from the CAB and fully utilize this unique capability.

5. **Until a "Consent-Based" process is identified and clearly understood by the states, local governments, and citizens it will be difficult to assess the economic or similar such impacts on the Site and the surrounding areas.**

The Savannah River Site Specific Advisory Board would like to make clear that:

- a. They are not opposed to commercial nuclear power generation.
- b. They are not concerned that the DOE would initiate a program that anticipated the unsafe storage of nuclear waste at SRS.

However, to seriously consider development of such a concept at SRS it will be necessary to offer some guarantees and incentives to the community. While additional jobs are always an attractive incentive this alone may not likely be adequate to convince the community and area "at large" of the attractiveness of this concept. There is resentment to the idea of SRS as a "The National Nuclear Waste Dump Site" and distrust that DOE would abide by the early commitments that might be made.

It is likely that such a concept would achieve "consent-based acceptance only if:

- Economic benefits were significant
- "High tech" programs were identified and implemented
- Programs were substantial, safe, secure, and offered other benefits to the area
- Programs were presented as being in the national interest and accepted as such.
- Significant commitments and deadlines were established, agreed to, and enforced.
- There is some limit in scope of the material to be temporarily stored, such as limits on volume, time, type, and age of materials, or limits on where or from which states the material is received.
- A case convincingly made that SRS is essential to any such disposition program.
- Other sites such as Yucca Mountain are not acceptable.

6. **The implementation of a costly program such as this may make adhering to a firm schedule impractical.**

The reopening of the repository selection process and, as a consequence, creation of interim storage sites will be a very costly endeavor in a time when the nation does not have the financial resources. This program will involve many different administrations and will certainly be confronted with political support that is not always consistently high.

### **Summary**

The CAB has strong views and concerns about the Interim Storage Program at SRS as noted in the discussion presented above.

- As DOE commences preliminary planning and implementation of any project, DOE should place major emphasis on the definition of the "Consent-Based" Process.
- The CAB strongly desired to be a part of the process to define what "Consent-Based" will mean and how it will be determined.

DOE should address each of these concerns in a manner that will convince the public that this is a program worthy of further consideration at SRS.

## **Another View of the Use of SRS for Interim Storage of Commercial Used Nuclear Fuel.**

The Citizens Advisory Board is considering two different positions concerning the possible use of SRS for interim storage of commercial used nuclear fuel. Some people do not want additional nuclear material brought on site, while others have concerns that certain prerequisites be met if interim storage is to be considered. For the sake of brevity, I will refer to the interim storage of commercial used nuclear fuel at SRS as “interim storage” during this discussion.

There are realities about interim storage that some people may not appreciate. No one can predict how long it could be before this new interim storage is required at SRS. We need not feel pressured to make any unconditional stands concerning approval or disapproval of the idea. The only immediate pathway to interim storage at SRS would be through a mandate by DOE. It is plausible that DOE could decide that interim storage at SRS is in the national interest and decide to store material using the “In the National Interest” rationale. For an action such as this to occur, I suspect that there would need to be some pressing national emergency or security concern. Otherwise, few people anticipate that DOE will be able to muster the type of “consent-based” approval that is envisioned before an interim storage location is chosen. It is more likely that the current and next administration will continue using the “kick-the-can-down-the-road” strategy of inaction for the foreseeable future. Before the CAB takes a firm position on the subject of interim storage at SRS, perhaps the people of the CSRA should consider the benefits of channeling their efforts toward encouraging cooperation and facilitating mutual benefit for the real possibility of storage of commercial used nuclear fuel at SRS.

Perhaps a realistic and pragmatic attitude might be “Bring It On!”. If one considers the advantages of interim storage at SRS, it makes a lot of sense. The following are some reasons why SRS should consider embracing the concept of interim storage at SRS:

- 1) Interim storage is not new to SRS. Interim storage has been in place at SRS for 60 years. SRS has the history, expertise, available land, infrastructure, and processes already in smooth operation, ready for more material, with little change necessary in basic operational strategies. SRS has analyzed, processed, handled, packaged, shipped, stored, and dealt with the challenges of nuclear materials quite successfully during that time, and has arguably done a better job of it than any other location on earth.
- 2) Any additional nuclear material brought on site will not harm the public. The methods of containerizing and storage are effective and capable of protecting the environment indefinitely. As long as the interim stored materials at SRS are monitored and maintained, there is little realistic possibility that contamination to the public could occur. Some people have introduced the catchy slogan “Don’t Waste Aiken!” to imply that interim storage may somehow harm the area by making it a waste dump. Interim storage is not accurately portrayed as dumping. Interim storage is a carefully planned and executed maintenance that SRS is quite capable of successfully handling. Since controls for each item for interim storage are similar, more items do not necessarily increase the risk of contamination. Each item represents a source of contamination that is largely independent from the other items. Possible leakage from one item would be limited to leakage from that item alone, and would be handled on a case by case basis. In other words, with hundreds of items in inventory, the consequence of an

individual item leaking does not represent the same risk as that of a single item with hundreds of times greater loading. For the unlikely event of leakage from a single container, responses have long been established to prevent public exposure beyond established limits. The materials can be individually containerized to eliminate a major risk as a result of the leakage of a single package. Nuclear materials received on the site will have safeguards comparable to all the other nuclear materials already in interim storage. We have successfully provided the safe storage of nuclear materials since the site went into operation. While there have been occasions of limited contamination, mitigation responses have been successful and have had extensive oversight by DOE and oversight organizations such as the Environmental Protection Agency (EPA) and the South Carolina Department of Health and Environmental Control (SCDHEC). SRS has learned much and incorporated additional safeguards over the years to ensure continued safe storage. Perhaps we should consider the slogan "Don't Waste Aiken's Potential!"

3) Interim storage can realistically be extended for as long as necessary. The length of time that SRS remains in custody of nuclear materials is not a safety issue. Nuclear materials can be repackaged here as well or better than anywhere else, and storage can be accommodated if DOE has the will to do it. If any materials need repackaging, we have the necessary technology and capabilities to repackage successfully. While it's true that the SRS natural environment is not conducive to permanent storage due to climatic weather conditions and water table realities, there is no realistic threat that nuclear contamination could dangerously affect the off-site public as long as DOE has the will to take the well-known measures for safe interim storage. If the United States were ever to lose the will to effectively deal with interim storage of nuclear materials, environmental contamination would be the least of our worries.

4) Nuclear materials can be protected from terrorist threats at SRS as well or better than any place in the United States. With 310 square miles of government controlled land that already has a top class security force, infrastructure and protective measures in place, there is no realistic claim that SRS is more vulnerable than any other interim storage location. One well monitored and easily defensible central location for all of our nuclear materials makes much more sense than having dozens of security vulnerable storage locations across the country.

5) While positive public support and confidence in SRS may not seem to some as a strong salient feature, one must consider the likelihood of worse sentiment in any other United States location other than perhaps the WIPP area in New Mexico. There are many individuals who have worked and lived in the CSRA for years who have strong confidence in the ability and integrity of the SRS team to properly manage nuclear materials. Those of us who have firsthand experience realize that there has been a strong emphasis on worker and public safety at SRS for many years. Having witnessed risky and unethical behaviors, easily avoidable accidents, injuries and deaths while working in refineries, chemical plants, commercial construction sites and private industrial settings, I know that the safest and best risk controlled facilities are nuclear power facilities and the SRS facilities. I have no doubts in living across the highway from the Savannah River Site boundary, since I have personally seen the contamination prevention and mitigation strategies in operation during the last 25 years.

6) Since someone will eventually receive the employment benefits of interim storage, it might as well be SRS. Many people in the CSRA have been gainfully employed through the continuing missions at SRS. Some have worked their entire careers in this one location, a benefit seldom experienced in today's world. Many inventions, patents and processes were developed at SRS by dedicated government workers who helped our country not only survive but win the Cold War. As many of us have experienced the sting of sequestration and reduced work time in the last few months, and many more have experienced the hardships associated with a weak economy, we should not be so quick in disregarding the stabilizing influence represented by the employment opportunities at SRS and subsequently in the CSRA. The prospect of continued employment opportunities at SRS should not be considered a shallow argument. Many areas of the country have seen their predominant sources of livelihood dry up and blow away in the last few years. Should we be oblivious of our own technical capabilities and to the potential of continuing opportunities for meaningful contribution to society? Hopefully, we don't need to endure hardships similar to the ones experienced by those displaced from the car manufacturing areas of the United States.

7) Bring It On! – SRS is well equipped and capable to handle the challenge of being an interim storage facility for the United States of America. For the past 60 years, SRS has met the challenge of support to the American public in the form of nuclear weapons preparedness with all its associated activities in safely processing and storing nuclear materials. The additional task of interim storage for commercial used nuclear fuel does not need to be considered a departure from the continuing contribution we could make to America's future.

*Stan Howard*  
Windsor, SC.

## Comments to the Citizens' Advisory Board

July 15, 2013

My name is Ernest Chaput and I am a resident of Aiken County. I addressed you in July 2012 on this same subject and today I have two comments for the Board's consideration:

1. Nuclear activities are an important part of Aiken County's history, and have helped to create the vibrant community we all enjoy. We all should be working hard to secure the future economic base which will provide the quality jobs and quality of life for our children and grandchildren. Nuclear activities and the Savannah River Site can and should be part of our future.
2. We should be selective in soliciting future nuclear activities. We should seek those activities for which our area is well qualified, activities which can be performed in a safe and environmentally responsible manner and which have an out-of-state pathway for waste materials. Supporting the backend of the nuclear fuel cycle might be one of those quality activities well suited to our area, but we won't know if it is a good or bad fit until a national program is developed. Until then I believe we should carefully monitor developments and make a decision only after a specific program has been put on the table and fully analyzed.

My specific recommendation is that the Citizens' Advisory Board defer any action regarding acceptance or rejection of a back end of the fuel cycle program until a specific proposal has been brought forward and can be analyzed. It is always better to react to facts. If deferral is not acceptable, my back-up recommendation is that the CAB generically support a back end of the fuel cycle program only if the state and local benefits exceed state and local risks.

Ernest S. Chaput  
July 15, 2013  
[esandc@prodigy.net](mailto:esandc@prodigy.net)



## **League of Women Voters of South Carolina**

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### **SPENT FUEL STORAGE AT SRS - 7/15/13 Citizens Advisory Board**

The League of Women Voters of South Carolina (the League) supports version A of the Citizens Advisory Board proposed policy statement. South Carolina and Washington State already manage the lion's share of defense high level waste; to triple SRS responsibilities by bringing "orphaned" commercial spent fuel curies to South Carolina should be resisted strenuously.

Also, please keep in mind that no DOE representative, nor even this Congress, can casually make legally enforceable assurances to South Carolina regarding future investments at SRS, or in future DOE programs, or future appropriations by future Congresses. This is a serious flaw in current considerations.

Since Congress & DOE took charge of the leaking high level waste tanks at SRS, steady progress has been made, with the site becoming progressively cleaner and safer. With adequate Congressional funding we all look forward to a future site in the Savannah Valley ready for future economic opportunities.

Almost 20 years ago the Nuclear Energy Industry succeeded in obtaining a federal loan guarantee program, and began to anticipate a "Nuclear Renaissance" – a vision with approximately 2 new reactors in almost every state. As of 2013 only four of those anticipated reactors are under construction. There are no loan guarantees yet because of disagreements between the utility and the federal loan program. The question is, should the utility or the taxpayers be responsible for cost overruns and schedule slips. The future of the industry is unpredictable.

As recently as last week the nuclear industry acknowledged that new nuclear plants are not likely to be constructed in the US for the next 10-20 years because of the temporary opportunity of cheap natural gas.

LWVSC believes that safe, monitored, onsite storage of high level wastes at SC reactors and also at SRS will optimize the country's chances of finally establishing a safe permanent repository.

If commercial spent fuel were to be stored at SRS, 70 congressional districts in 39 states, and many related and powerful industries, would no longer need to be concerned about spent fuel accumulating in their communities, or be eager to support investment in federal research and funding for the much-needed repository. We need them all to work with us for a repository.

If South Carolina provides storage, its political power is diminished and potential allies will vanish. Recall the rather unlikely trio that addressed abandoned defense wastes and energized the Nuclear Waste Policy Act: Governors Dixie Lee Ray, Lamar Alexander, and Dick Riley – what are the chances that could happen again in this political environment?

Thank you to the CAB members for your collective diligence over the decades. You and your predecessors have done a good job of realistically focusing on SRS cleanup priorities and activities. We wish you well; we also wish SRS well. We all deserve it, and we need vigilance as well as luck.

Suzanne Rhodes for League of Women Voters of South Carolina

The League of Women Voters, a nonpartisan political organization, encourages informed and active participation in government, works to increase understanding of major public policy issues, and influences public policy through education and advocacy. Membership in the League is open to men and women of all ages.

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15 July 2013

**Subject:** SRS "Consent Based Process"; points for CAB WM committee...supporting Option B

1. I am Charles Munns, an Aiken resident. I am presenting tonight for myself. I am not employed by or speaking for any local company. I am interested in the best for the Aiken community, and I have a pretty good ear to the community and its businesses.
  - a. I am not advocating tonight for any specific new proposal, we do not know enough to make a reasoned judgment.
  - b. My main point tonight is that it is premature for the CAB to place its cards on the table. It is too early to say no to any potential SRS project. We have no idea of the characteristics or considerations of any potential project nor who the sponsoring activity might be.
  - c. I heard discussed earlier tonight yucca mountain, inadequate federal budgets, lack of trust with DOE, oil tanker fires, cancer, residents that would leave Aiken, and the liabilities of reprocessing, all used as arguments to just say NO to a temporary storage project at SRS. Those arguments do not relate to the pros and cons of what a future project might hold. The arguments for Option A do not make good sense.
  - d. The CAB's statement this summer should not flow from any of those claims. Rather, you should be asking DOE EM to be included as part of the future discussions. It is not automatic that you would be included. Future discussions will be conducted by DOE NE or maybe even another agency, whereas the CAB is chartered by DOE EM.
  - e. Your proposal should express the concerns you might have about storage and then ask for a seat at the table as future projects might get defined ... nothing more.
2. Please let me make three quick points:
  - a. To advocate for your option B -- the moderate position... That is to say, the CAB should list its concerns and then ask to stay as part of the discussion.
  - b. To ask you to consider the CABs desired outcomes and motives, and that you act accordingly.
  - c. To discuss my rational for option B
3. First. Option B, the moderate position, is the best choice at this time. I do not believe DOE EM, your sponsoring department, is ready for debate about Yucca Mountain,

reprocessing, government finances, cancer, or even storage of used fuel. The situation this summer does not lead to such debate. The first step will be to help communities define what is meant by "consent based" projects.

- a. The CAB should choose to participate in the long term discussion, it should not choose to just draw an arbitrary red line ahead of its time...the choice presented by your two options is not "saying no to waste" or "yes with limits"...rather Option A draws an absolute "red line", and Option B asks "to stay engaged", and of those two the best position is to stay engaged.
4. Second. I would ask you to think about your desired outcome and your motivation for this position paper now.
- a. If your goal is to provide "fact based" advice to DOE EM about some of the Blue Ribbon Commission recommendations then option B provides the best path ... it presents your concerns and asks to stay involved.
  - b. If you desire an emotional public statement for political constituents, many from out of our area, then shame on you. That is not your job and you would do a disservice to the CAB's reputation, to DOE EM, and to this community.
5. Lastly. Let me provide some Logic points for option B, the moderate statement.
- a. Let us signal that we desire to frame the discussion, and to keep the welcome sign open at the door to SRS. Option B does that; Option A implies to potential companies and to policy makers that this community is willing to capriciously forestall and potentially risk SRS's future.
    - i. This community would not be the same w/o continued growth at SRS. There is ample evidence from history and from today of the value of SRS to this community. The SRS has been of more value to this community than any other single part of our region.
  - b. It is premature to tell DOE EM that you will not accept any project for temporary storage of used fuel. We have no idea what the proposal might be, what limits would apply to such a project, what "considerations" the region and state would achieve, what the consequences of saying no or yes would be or even who the organization is that might approve a project.
  - c. It is appropriate to tell DOE EM about your concerns...not as red lines, but as issues for discussion...the moderate option B does that well.
  - d. Saying NO to new missions at the SRS and to Storage will affect the whole community (Business, Education, Social Agencies, Developers, Government, employees, citizens and more) ...they all need to be involved in any discussion that will affect the character and foundation of our community. Option B allows for that continued discernment, option A does not. The CAB to date has mostly heard from out of state

and out of region activist organizations and a few of the more available and vocal public. It is wrong to think that the CAB has heard the sense of the entire community.

6. In summary -- at this point the CAB's best approach, and I would argue it has only authorized approach, is to present to DOE EM a balanced reasoned voice of logic not an emotional ultimatum. You are the CAB selected for your diversity of experiences to provide EM fact based advice on the future of the site. I suggest you advocate for a continuing seat at the table as EM wrestles with the survival of the site and some tough issues. Provide them your concerns but do not lock yourself out by drawing a premature emotionally driven ultimatum or red line. Adopt the option B policy statement. Express your concerns and ask to have a continued seat at the table where future discussions will occur.

Thank you for listening,

**Charles Munns**

Aiken resident

Vice Admiral, USN (ret.)

Former CEO of the managing contractor at the Savannah River Site