

Minority Position
Position Paper for the Savannah River Site's Citizen Advisory Board on Using SRS for Interim Storage of Spent Nuclear Fuel
7/24/2013

- On Tuesday, July 23, 2013 The Citizens Advisory Board (CAB) voted to approve a position paper that states in part, **“The SRS Citizens Advisory Board....is opposed to the use of SRS as a site for interim storage of spent nuclear fuel from commercial nuclear reactors.”**

General Summary: A minority on the Citizens Advisory Board felt that while many of the concerns expressed by the Position Paper were valid the conclusion drawn of a “hard” position of “No interim storage of spent nuclear fuel ever” was premature, unnecessary, unwise, and hence, not a constructive action by the CAB. This rejection is done at an early stage of the process and is indifferent to incentives and other conditions that may be offered. On the other hand, the minority position is that the CAB should be engaged and be involved in developing the “consent-based” process and working to ensure that a generous incentive package with clearly established and legally enforceable limits and deadlines are developed. It is the minority view that a properly developed interim storage program with such incentives and enforceable provisions would possibly be acceptable to the community. If such a program is determined to be lacking then the capability to reject any offer is always available at any stage of the process.

Discussion: The opposition of SRS as an interim storage site at the earlier stages of the interim program development creates a negative environment toward the nuclear community which is counter-productive. This action rejects any potential offer even before any concept or idea is offered. This action is unprecedented in the history of the Site. Heretofore, the communities around SRS and the SRS have always been receptive to additional nuclear programs being added to the Site. In the past additional missions such as the Mixed Oxide Fuel Fabrication Facility were embraced as they brought additional high paying jobs and high technology work to the Site. While it is not clear just what would be brought to the area with the Interim Storage mission it seems prudent to limit our view to expressing concerns that the surrounding citizens may have at this stage of development and at least being receptive to consider proposals that the Interim Storage program may entail. As proposals are discussed and presented in more detail the local citizens can always exercise the option to say “No” at the point the proposals are understood and determined to be inadequate. At that time the decision will be based on an understanding of the facts.

Any potential mission of this nature brought to the Site offers the promise of two features:

- One, the Interim Storage mission will necessarily involve a “consent-based” process which includes the states, local governments, and other stakeholder groups. This “consent-based” process is not understood but it offers the promise of permitting local groups and communities to define what is acceptable. Such limits as type of nuclear materials, volume of materials, age of materials, where the material originated, and how long storage would be permitted would be defined and limited in this process. These limits could be made into strong commitments and legally binding with severe penalties for failure to meet. By not rejecting such a proposal outright a local community would be more likely to be a party to and help define that process. By taking a strong negative position now, the CAB risks being a group with lesser, or perhaps no, involvement in the development of a “consent based” process.
- Two, the Interim Storage mission offers the promise of a substantial and flexible incentive program. It is the view of the minority that some high level of incentives would be acceptable to the

community at large. It is not known what incentives could be, but one could envision a significantly expanded role for the Savannah River National Laboratory, or perhaps a Small Modular Reactor at SRS or any number of other programs. Many feel the incentive will be limited to the work force of the Interim Storage mission and if indeed this is the case there is general agreement this level of incentive will not likely be adequate. At any rate it seems the most prudent course would be to stay engaged and work to ensure the incentives are adequate.

- There are a number of other considerations that may make acceptance of the Interim Storage mission more palatable. These include:
 - Use of SRS for this mission is determined to be in the national interest and is accepted as such by the local citizens.
 - Use of SRS is determined to be “absolutely essential” for other reasons.
 - Use of SRS could be leverage in developing a binding commitment that the deep geological disposal is being pursued in “good faith.”

The Position Statement points out many concerns that will indeed have to be addressed such as the past mismanagement of the Nuclear Waste Management program by the federal government. Indeed, these are aspects of the program that will have to be dealt with.

Concluding Comments: Both majority and minority views express real concerns about the interim storage program. However, the minority view of staying engaged, being involved in program development, including guidelines and incentives, could possibly lead to a successful interim storage program that the community will embrace and deem worthy of acceptance. Any rejection that may later become necessary would then be based on known conditions and facts as opposed to the majority view of rejection of an interim storage program “a priori” with no consideration at all of a viable program.