



AIKEN COUNTY LEGISLATIVE DELEGATION

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October 27, 2011

Representative Lee Hamilton, Co-Chair,
General Brent Scowcroft (retired), Co-Chair
The Blue Ribbon Commission on America's Nuclear Future
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC, 29585

Subject: Draft Report to the Secretary of Energy

Dear Mr. Hamilton and General Scowcroft:

We have reviewed your Commission's draft report on America's Nuclear Future and have important comments and recommendations which would strengthen our nation's ability to effectively manage the back end of the nuclear fuel cycle. We thank you and your fellow Commissioners for the time and dedication obviously expended in producing the draft report and refocusing our attention on this priority need.

There are many portions of the draft report which succinctly captures the gravity of the nuclear waste issues and makes constructive recommendations for improvement. Unfortunately, the report does not make other recommendations which would significantly improve the nation's ability to quickly, safely and economically manage nuclear waste. In our opinion, the report does not place adequate emphasis on the real goal – to safely isolate the public and the environment from hazards resulting from high level nuclear waste at the earliest possible time.

In reviewing the draft report's recommendations, the following overarching comments and changes are offered:

1. The report must be modified to include an assessment of Yucca Mountain as the first deep geologic disposal facility. Yucca Mountain meets the stringent criteria you identify for siting and developing deep geologic facilities:

- Yucca Mountain is strongly supported by the most-affected communities
 - Yucca Mountain meets or exceeds appropriate science-based standards
- Equally important, Yucca Mountain is the law of the land through the National Waste Policy Act.

Including Yucca Mountain in the report also significantly reduces (or eliminates) the need for interim storage, reducing safety implications resulting from (1) multiple handlings of fuel and (2) transportation. A significant saving of rate-payer funds will also accrue.

2. A well designed RD&D program can result in nuclear fuel cycle systems which significantly reduce (1) waste requiring deep geologic disposal and (2) proliferation concerns while enhancing safety and economic performance.

The H Canyon facility, at DOE's Savannah River Site, is the nation's only facility which can support large-scale demonstrations of the back end of new fuel cycles. The report should recommend retention of this unique capability to support future RD&D activities.

3. The draft Commission report does not specifically address disposition of vulnerable research reactor used nuclear fuel. The Department of Energy is looking to the Commission's report for guidance on the disposition of research reactor used nuclear fuels:
 - Most of these fuels are at the Savannah River Site. Neither the fuels nor their storage basin were designed for long-term storage
 - Processing in the SRS H Canyon is the only method available to prepare these fuels for disposition
 - Processing in H Canyon is not a proliferation concern: (1) Plutonium is not separated and (2) HEU is blended down – a proliferation advantage.

It is imperative that your final report include a recommendation to promptly process these fuels and prepare the wastes for deep geologic disposal.

4. The back end of the nuclear fuel cycle is dominated by safety concerns, yet the draft report does not address the safety implications of its draft recommendations. Previous analyses have convincingly demonstrated that public safety and environmental protection is significantly enhanced by disposal of high-level nuclear waste in a deep geologic facility.

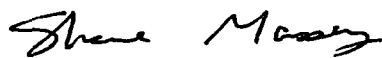
It is strongly recommended that your report include an analysis of safety and environmental considerations resulting from both (1) additional handling and transportation of nuclear wastes associated with interim storage and (2) the probable 20 year delay in availability of a deep geologic facility.

Thank you for the opportunity to comment on your draft report. We appreciate the full Commission's, and your staff's giving these comments your most careful consideration.

Sincerely,



Senator W. Greg Ryberg



Senator A. Shane Massey



Senator Nikki G. Setzler



Rep. Tom Young, Jr.



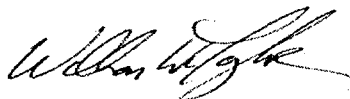
Rep. William Clyburn



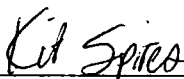
Rep. William "Bill" Hixon



Rep. J. Roland Smith



Rep. Bill Taylor



Rep. L. Kit Spires