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NC WARN



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A Plea For Open Scientific Debate on the Uncertainties of CP&L's Nuclear Waste Plan

A Statement to the NRC Atomic Safety and Licensing Board
December 7, 2000

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We are here as informed citizens of a region that has been living with mounting safety questions concerning CP&L's nuclear waste build-up for more than two years now.

We respectfully request that you use your discretion to allow us a few minutes to speak outside the bounds of your normal agenda today – especially due to the unique and unprecedented nature of this project. So many citizens have demonstrated concern and an understanding of the issues, we deserve not only an opportunity to briefly address you, but also a full and fair scientific examination of the risks associated with this plan.

Frankly, there is a great deal of frustration building among the public. It has been well over a year since 11 local governments passed resolutions calling for an open review. Our U.S. senator called for full safety hearings. Representatives of our state legislature joined that call. You need to understand that we feel exasperated since even our elected representatives have been unable to move this process beyond lawyers' games, loopholes and public relations distortions. Nor have they been able to prevail upon CP&L to behave in a manner consistent with the democratic ideals that are supposed to guide our nation.

We know that despite the strength of Orange County's legal challenge, it is quite possible that this will be the last time you will be in North Carolina; that today's proceeding could close out this process without the hearings, and without the full safety examination called for by so many – and which are surely required by any sense of prudence, wisdom and fairness. We know you are under pressure from the nuclear industry to not reject its primary corporate needs; the ASLB's actions over the years have made that influence transparent.

We do not take time away from our families, work and community pursuits merely to play some kind of game. We have been closely following the various scientific aspects of this issue. Thanks to Orange County and other local governments, who hired Dr. Gordon Thompson to analyze the plan, we have come to understand that there are very serious questions which simply must be answered publicly before CP&L's proposal could go forward.

We are aware, from Dr. Thompson's work and from the NRC's own recent research, that waste pool risks are higher than previously believed. And that after twenty years of avoidance, the NRC staff recently admitted that Dr. Thompson has been correct about a key element of risk: that partial loss of water from a pool can be a more severe accident condition than total loss of water.

After more than two years of studying this issue, we are quite aware that estimating the probability of spent fuel accidents is a highly complex problem involving many unknowns, uncertainties, and new areas of inquiry. But now we hear nonsense about a new CP&L report that claims an Ice Age is more likely to occur today than a waste pool accident at Shearon Harris. That large stack of

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paper is no more than a meaningless prop unless the company's technical people are called upon to debate the content of the analysis; we don't even know who the shadow consultants are that authored this curious report.

The nuclear industry has long claimed that the undetected heat-up of waste pools simply cannot happen. Yet twice this year, loss of spent fuel cooling at two separate U.S. nuclear plants went unnoticed for two days, and temperatures rose beyond the point where safety systems are expected to be damaged. Will you require those "impossible" events to be factored into CP&L's analysis?

When Dr. Thompson estimates – based on CP&L data – the cumulative probability of a spent fuel fire at Harris over a 30-year period to be 1 in 2,000, we cannot dismiss that without further examination. Nor should this Licensing Board. Whatever the probability, what is far beyond question is that the consequences of a major accident at Shearon Harris could be too terrible to comprehend. And yet we stand here again and listen to CP&L and NRC lawyers try to dismiss our concerns – and those of a highly qualified nuclear safety expert – by summarizing extremely technical issues that they are not even qualified to address.

You judges of the ASLB could have easily conducted a two week in-depth hearing by now – and had the NRC staff perform an environmental impact study – for far less time, acrimony, and for far less money than the millions CP&L has spent to prevent them.

Put yourself in our shoes. How do you think we feel when Dr. Thompson – and David Lochbaum of Union of Concerned Scientists – two prominent, honest scientists we have learned to trust – warn that CP&L's plan represents a substantial increased risk that could and should be avoided?

It is blatantly obvious to all who are watching that the sole reason CP&L pursues the use of high-density storage in the new pools is because they are partially built – not because of safety. It would cost little, if any more, to employ dry storage instead of increasing the risk of a major accident by amassing one of North America's largest stockpile of nuclear material under one roof with an interconnected cooling system. This past Sunday, the CEO for a New England utility insisted seven times in an editorial that dry storage is safer than pools.

We know that Thompson and Lochbaum's work is thorough, credible, and unnerving. They are willing and eager to defend their opinions in a formal hearing. Contrast that with the millions of dollars CP&L has spent on lawyers, consultants and public relations campaigns in order to limit scientific debate to written legal briefs – where technical issues are subject only to your closed door review; and where scientists never face each other or the public. We know that if CP&L's plan were the right thing to do, they could justify it in the face of public – and scientific – scrutiny.

To put it plainly, we have a legitimate scientific dispute and thus we deserve a legitimate scientific debate. We urge you to facilitate this. It is incomprehensible that you could leave us to accept CP&L's waste expansion without a fair process. There is so much at stake here – the peace of mind of this region's citizens, democratic process itself, and the credibility of your agency as well. Please do the right thing. We will be grateful to you.

In the Matter of)
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CAROLINA POWER & LIGHT COMPANY) Docket No. 50-400-LA
)
(Shearon Harris Nuclear Power Plant))

I hereby certify that copies of the foregoing LIMITED APPEARANCE STATEMENT OF NC WARN have been served upon the following persons by U.S. mail, first class, or through NRC internal distribution.


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Docket No. 50-400-LA
LIMITED APPEARANCE
STATEMENT OF NC WARN


Office of the Secretary of the Commission

Dated at Rockville, Maryland,
this 11th day of December 2000