

RESPONSE TO FREEDOM OF  
INFORMATION ACT (FOIA) REQUEST

2017-0097

1

RESPONSE  
TYPE☐

INTERIM

☒

FINAL

## REQUESTER:

Julian Tarver

## DATE:

10/31/2016

## DESCRIPTION OF REQUESTED RECORDS:

internal and external communication that Region IV or other NRC offices dealing with law enforcement and intelligence have relating to Media Island International (MII), located in Olympia, Washington.

## PART I. -- INFORMATION RELEASED

- ☒ Agency records subject to the request are already available in public ADAMS or on microfiche in the NRC Public Document Room.
- ☒ Agency records subject to the request are enclosed.
- ☐ Records subject to the request that contain information originated by or of interest to another Federal agency have been referred to that agency (see comments section) for a disclosure determination and direct response to you.
- ☐ We are continuing to process your request.
- ☒ See Comments.

## PART I.A -- FEES

AMOUNT\*

\$

☐

You will be billed by NRC for the amount listed.

☒

None. Minimum fee threshold not met.

☐

You will receive a refund for the amount listed.

☐

Fees waived.

\*See Comments for details

## PART I.B -- INFORMATION NOT LOCATED OR WITHHELD FROM DISCLOSURE

- ☒ We did not locate any agency records responsive to your request. *Note:* Agencies may treat three discrete categories of law enforcement and national security records as not subject to the FOIA ("exclusions"). 5 U.S.C. 552(c). This is a standard notification given to all requesters; it should not be taken to mean that any excluded records do, or do not, exist.
- ☐ We have withheld certain information pursuant to the FOIA exemptions described, and for the reasons stated, in Part II.
- ☐ Because this is an interim response to your request, you may not appeal at this time. We will notify you of your right to appeal any of the responses we have issued in response to your request when we issue our final determination.
- ☐ You may appeal this final determination within 30 calendar days of the date of this response by sending a letter or email to the FOIA Officer, at U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001, or [FOIA.Resource@nrc.gov](mailto:FOIA.Resource@nrc.gov). Please be sure to include on your letter or email that it is a "FOIA Appeal."

## PART I.C COMMENTS ( Use attached Comments continuation page if required)

In conformance with the FOIA Improvement Act of 2016, the NRC is informing you that you have the right to seek assistance from the NRC's FOIA Public Liaison.

The NRC's search of Region IV, which covers the state of Washington, as well as program offices within NRC's HQ (including the Office of Investigations, Office of Enforcement, and Nuclear Security and Incident Response, which deal with law enforcement and intelligence), did not locate any responsive records. Our search of ADAMS did locate two publicly available items of correspondence that respond to your request; they are enclosed.

SIGNATURE - FREEDOM OF INFORMATION ACT OFFICER

Stephanie A. Blaney, Acting

PR 51  
(73FR59547)  
(73FR59551)

**Rulemaking Comments**

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**From:** Rick Fellows [rick@mediaisland.org]  
**Sent:** Tuesday, February 03, 2009 1:08 AM  
**To:** Rulemaking Comments  
**Subject:** Federal Register Notice: 73 FR 197-- 10/09/2008 Docket ID-2008-0482 and Docket ID-2008-0404

For the forty years I have followed radioactive waste issues I have become increasingly convinced that we are leaving our children a nightmare. There is no geologic formation which does not connect with aquifers. As we lose water quality in multiple ways, radioactivity stands out as a serious concern. The idea that we will be saved by the diffusion of substances to lower concentrations is belied by the fact of the relatively low volume of the thin layer of the earth we call the biosphere. This is where almost all known life exists. Isotopes mimic the elements our bodies take into our bones and our sexual organs and cause leukemia, cancer and mutation as they decay. These invisible and deniable phenomenon are known to send alpha particles and gamma rays ripping through the DNA of our cells.

If General Electric were denied such a large share of our media through control of NBC and if Westinghouse, the other end of a nuclear plant from GE, didn't own such a large media network, I feel that congress and the public would not consider anything short of phasing out nuclear fission.

Thanks for your attention,

-Richard M. Fellows Director, Media Island International

Template = SECY-067

SECY-02

Received: from mail2.nrc.gov (148.184.176.43) by TWMS01.nrc.gov  
(148.184.200.145) with Microsoft SMTP Server id 8.1.291.1; Tue, 3 Feb 2009  
01:08:11 -0500

X-Ironport-ID: mail2

X-SBRS: 5.2

X-MID: 25339327

X-IronPort-Anti-Spam-Filtered: true

X-IronPort-Anti-Spam-Result:

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X-IronPort-AV: E=Sophos;i="4.37,370,1231131600";

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with ESMTP; 03 Feb 2009 01:08:11 -0500

Received: by rv-out-0708.google.com with SMTP id f25so1860536rvb.50 for  
<rulemaking.comments@nrc.gov>; Mon, 02 Feb 2009 22:08:09 -0800 (PST)

MIME-Version: 1.0

Received: by 10.141.2.18 with SMTP id e18mr2740318rvi.142.1233641289332; Mon,  
02 Feb 2009 22:08:09 -0800 (PST)

Date: Mon, 2 Feb 2009 22:08:09 -0800

Message-ID: <29daa50e0902022208h6d6bdd77h3ebdbaff2758db51@mail.gmail.com>

Subject: Federal Register Notice: 73 FR 197-- 10/09/2008 Docket ID-2008-0482  
and Docket ID-2008-0404

From: Rick Fellows <rick@mediaisland.org>

To: rulemaking.comments@nrc.gov

Content-Type: multipart/alternative; boundary="000e0cd1130ad4b67b0461fd7e82"

Return-Path: rick@mediaisland.org

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OFFICE OF THE SECRETARY  
CORRESPONDENCE CONTROL TICKET

Date Printed: May 19, 2009 12:49

PAPER NUMBER: LTR-09-0217

LOGGING DATE: 05/19/2009

ACTION OFFICE: EDO

To: Weber, NMSS

AUTHOR: Diane D'Arrigo (Nuc. Info. & Resource Svc.)

AFFILIATION:

ADDRESSEE: Barack Obama

SUBJECT: Yucca Mountain

CYS: EDO  
DEDMRT  
DEDR  
DEDCM  
AO  
RIV

ACTION: Appropriate

DISTRIBUTION: RF

LETTER DATE: 05/04/2009

ACKNOWLEDGED No

SPECIAL HANDLING:

NOTES:

FILE LOCATION: ADAMS

DATE DUE:

DATE SIGNED:

Template: SECY-017

E-RIDS: SECY-01

May 4, 2009

Hon. Barack Obama  
President of the United States of America  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

Dear President Obama:

We welcome your decision to curtail activity at the proposed Yucca Mountain radioactive waste site and endorse your plan to evaluate the nation's high-level radioactive waste and commercial irradiated fuel programs and policies. We want to be involved in this process and we hope it will be earnest, open, and transparent. In that spirit, we urge you to ask all levels of your Administration to embrace and honor this period of evaluation of nuclear waste policy and ensure that the voices of the public are heard in that evaluation.

We represent groups rooted in communities impacted by radioactive waste -- the generation, storage, and potential transportation of this dangerous material, as well as communities that have been targeted for, or currently "host" disposal sites. We are concerned for the health and sustainability of our communities. We are "stakeholders," in the original sense of the word, when it comes to radioactive waste policy.

It is deeply disturbing to us that Secretary Chu suggested that the Yucca licensing process might continue -- and also that acting DOE Assistant Secretary for Environmental Management Ines Triay recently traveled to a meeting in Georgia at which DOE contractors were urged by her office to pursue irradiated fuel storage and reprocessing -- long before the radioactive waste evaluation has even begun. We ask you and your team to conduct a real evaluation -- not prejudice the outcome.

President Obama, we applaud your commitment to sound science as the basis for sound public policy. In our view, there are few decisions that our government will make which rank, in terms of long-term impact, with the plan for this waste. Irradiated fuel contains more than 95% of the radioactivity generated to date by industrial-scale nuclear enterprise.

We wish to offer you our perspective on Yucca, on nuclear reprocessing, centralizing storage and on the current storage of irradiated fuel at commercial reactor sites.

It is our unequivocal finding that sound science has **not** been the basis of, nor the guide for implementation of the Yucca Mountain project; many of the organizations signing this letter have repeatedly called, and worked for the cancellation of the Yucca dump.

In 1987, when Congress amended the Nuclear Waste Policy Act, abandoning the deliberate repository site selection process of the Act and singling out the Yucca Mountain site as the only candidate repository site to be studied, it was understood that this was a purely political decision that the Nevada congressional delegation was

powerless to stop. In 1992, when it was evident that the Yucca Mountain site could not meet the EPA's general radiation protection standard for repositories, instead of rejecting Yucca, Congress rescued the site. It directed EPA to promulgate new, "reasonable" standards, specific to Yucca Mountain, consistent with recommendations of a National Academy of Sciences panel study to consider the technical bases for a site-specific Yucca Mountain radiation protection standard. A key portion of the new standard subsequently was overturned by the D.C. Circuit Court of Appeals for not being consistent with an important safety recommendation of the NAS report. The revised standard is now in litigation over how that safety recommendation is to be addressed.

By 1995, sufficient information existed to convince DOE that infiltrating water could move rapidly down through fractures in the mountain, incorporate radionuclides from the emplaced waste, and result in unacceptable radiation releases to the environment. This ultimately resulted in a Yucca Mountain repository strategy change by DOE to primary reliance on engineered, rather than natural, barriers to delay release of radionuclides. And in 2001, the recognition of technical flaws in the site resulted in the removal from DOE's Site Recommendation Guidelines of a site disqualification provision designed to assure that a site with such a hydrologic defect would not be considered for development as a repository – another change in the rules rather the application of them.

In 1998, many of the undersigned groups tried to have these same rules enforced by signing the "Petition for Disqualification of Yucca Mountain"<sup>1</sup> that put a spotlight on the fact that Yucca could not meet the original, legislatively defined Site Suitability Guidelines for a geologic repository with respect to rapid groundwater movement. With more than 200 organizations<sup>2</sup> supporting this petition, it was a grave disappointment that then-Secretary of Energy Bill Richardson did not act to disqualify the Yucca Mountain site. Richardson stated that he agreed with the Petition<sup>3</sup>, but paradoxically, did not act on it; stating only that further study was needed. We do appreciate that President Clinton was an ally we worked closely with in stopping the shipment of irradiated fuel to the Yucca site in Nevada during the 1990's while the site was still under study.<sup>4</sup> We affirm to you today our backing, and readiness to work with you for a decision to suspend all activity at Yucca Mountain – and its ultimate cancellation.

We hope and ask that you will include in your policy review of radioactive waste, data and analysis from non-industry sources. Sound science and democratic inclusion of the public, particularly impacted communities such as ours, must be the basis for any plan going forward.

We cannot wait for that process, however, to deliver these urgent findings: reprocessing is not a credible plan for radioactive waste management and it is not a "waste solution." The volume of irradiated fuel is reduced; nonetheless *total waste* volume is substantially

<sup>1</sup> Petition for Disqualification of Yucca Mountain posted on-line at: <http://www.nirs.org/radwaste/yucca/disqualifyyuccapetitionfinal.htm>

<sup>2</sup> Letter to Secy Richardson with Petition for Disqualification Signatories posted on-line at: <http://www.nirs.org/radwaste/yucca/disqualifyyuccafinalletterwithsignatures.htm>

<sup>3</sup> Letter from Secy Richardson to Michael Mariotte, Executive Director, Nuclear Information and Resource Service, January, 1999.

<sup>4</sup> President Clinton issued veto statements on revisions to the Nuclear Waste Policy Act offered by nuclear industry-supporters during both his terms. A letter from White House Chief of Staff Panetta to Congress pledging this veto in 2000 is attached.

increased.<sup>5</sup> Further, a robust solid, ceramic waste form is converted to a caustic, highly radioactive liquid<sup>6</sup> -- not an improvement! Where reprocessing has been done, a substantial portion of intermediate liquid waste has either been directly discharged into water (France, United Kingdom, Russia; Japan) or has leaked into groundwater (Hanford, Savannah River Site, West Valley). "Dilution" is not a solution, particularly when the most efficient concentrating food chain is aquatic.

The claim that waste is "recycled" is inaccurate--only 1% is re-usable, and that is plutonium.<sup>7</sup> Plutonium as a fuel is needlessly dangerous; in commerce this weapons-usable material could be diverted into the wrong hands.<sup>8</sup> In a reactor plutonium is harder to control;<sup>9</sup> if reactor control is lost, plutonium fuel results in twice as many fatal cancers as the same accident would cause if uranium fuel were in use.<sup>10</sup>

The claim that the uranium can be re-used is impractical since the attempts to do so during the Cold War resulted in catastrophic contamination of the uranium enrichment infrastructure.<sup>11</sup> These "hidden costs" or externalities must be included in an assessment of the cost of such a program, over and above the DOE's projected \$15 billion cost to build a reprocessing plant. Reprocessing is only an appearance of a solution. We also share the concern that many of the likely sites for reprocessing in the United States would unfairly impact low-income communities or low-income communities of color. Together we must find a better way.

Centralizing the storage of irradiated fuel is integral to reprocessing. We are concerned that any centralized storage site may become de facto permanent. Over the last four decades there has also been a long series of attempts to establish "centralized interim storage" independent of reprocessing: the defunct Monitored Retrievable Storage (MRS) program which toward the end systematically targeted Indian Reservations; the industry's "privatized" storage program -- again targeting the Native Americans, first the Mescalero Apache Nation in New Mexico and the Skull Valley Goshute Reservation in Utah; a near decade of effort by the industry to change the Nuclear Waste Policy Act to allow centralized storage at Yucca, the sovereign treaty lands of the Western Shoshone Nation.

As a community we have worked, and will continue to work, to stop such plans--for five key reasons: first, the risks and hazards of transportation are compounded if the waste is taken to a "temporary" site; second, we do not believe that a site will be "temporary" as

<sup>5</sup> Schneider, Mycle and Yves Merignac, April 2008. "Spent Nuclear Fuel Reprocessing in France." A report of International Panel on Fissile Materials. Posted as of 04-10-2009 at: [http://www.fissilematerials.org/ipfm/site\\_down/nr04.pdf](http://www.fissilematerials.org/ipfm/site_down/nr04.pdf)

<sup>6</sup> *ibid.*

<sup>7</sup> See Bob Alvarez, June 2008. Institute for Policy Studies "Nuclear Spent Fuel Recycling" posted at: [http://www.cornnet.nl/~akmalten/Alvarez\\_nuclear\\_recycling\\_June-21-2008-rev-2.pdf](http://www.cornnet.nl/~akmalten/Alvarez_nuclear_recycling_June-21-2008-rev-2.pdf). And July 2008. Foreign Policy in Focus "Nuclear Recycling Fails the Test" posted at: <http://www.fpiif.org/fpifxt/5351>

<sup>8</sup> Union of Concerned Scientists June 2008. Nuclear Reprocessing: Dirty, Dangerous and Expensive. Posted on-line: [http://www.ucsusa.org/assets/documents/nuclear\\_power/nuclear-reprocessing-factsheet.pdf](http://www.ucsusa.org/assets/documents/nuclear_power/nuclear-reprocessing-factsheet.pdf)

<sup>9</sup> See, among others, Dana Powers of the Advisory Committee on Reactor Safety to the U.S. Nuclear Regulatory Commission, letter to Chairwoman Jackson, May 17, 1999 post at: <http://www.nrc.gov/materials/fuel-cycle-fac/mox/pdf/4621825.pdf> which raises specific concerns about response time to reactivity transients in the reactor core; and also Paul Leventhal, Nuclear Control Institute <http://www.nci.org/s/sp21297.htm>

<sup>10</sup> Lyman, Edwin, 1999. Nuclear Control Institute, Public Health Consequences of MOX Fuel: NRC Reactor Licensing Issues. Posted at: <http://www.nci.org/i/ib12199.htm>

<sup>11</sup> See series of articles in the Washington Post, August - December 1999 from investigative journalist, Jobie Warrick, including: <http://www.washingtonpost.com/wp-srv/national/daily/sept99/paducuh21.htm>

long as more of this waste is being generated; third, we do not see moving the waste just so more can be generated as appropriate policy; fourth, putting this most persistent and deadly of wastes in a single congressional district when there is not a fully funded permanent program in place does not facilitate ongoing congressional appropriation for this problem; and finally in the case of an Indian Reservation, we oppose the *export* of some of the worst wastes our dominant society has ever produced in order to dump it on the people of another Nation.

In addition to sharing these views we ask your help with the waste where it is today in existing decentralized storage—at reactors. This situation is not responsive to the concerns and needs of the communities where this storage is located. The activist community that has opposed Yucca Mountain over the past two decades engaged with community organizers in reactor communities. A dialogue was established about current waste storage practices and the needs of communities where that is currently happening. We would like to share the findings known as “Community Principles for Safeguarding Nuclear Waste at Reactors” with you. Please see the attached document<sup>12</sup> (also endorsed by over 200 groups nationwide). In summary these principles include:

- Potential for drain-down leading to fire in overloaded wet-storage pools. This is the single greatest danger at a nuclear site—and one of the greatest threats to homeland security today;<sup>13</sup>
- Pools should only store irradiated fuel for the first 5 years;<sup>14</sup>
- Dry waste containers must be built with more quality control and care;<sup>15</sup>
- Containers should include heat and radiation monitors;<sup>16</sup>
- Containers should not be visible from outside the site boundary;<sup>17</sup>
- Containers should not be put on a pad like bowling pins – rather should be spread out and “hardened” to prevent and minimize harm from a potential attack;
- Communities should have funding for monitoring;
- Storage should be reviewed on a regular, annual basis;<sup>18</sup>
- Those signing the “Principles for Safeguarding Nuclear Waste at Reactors” oppose reprocessing of the waste due to the increased number of waste streams and the potential for nuclear proliferation.

These minimal requests from communities that currently host this deadly waste and are most impacted now, and will likely remain so for decades to come, must be factored into

<sup>12</sup> Also posted on-line at: <http://www.citizen.org/documents/PrinciplesSafeguardingIrradiatedFuel.pdf>

<sup>13</sup> Alvarez, Robert, Jan Beyea, Klaus Janberg, Jungmin Kang, Allison McFarlane, Gordon Thompson, Frank N. von Hippel. 2003. Reducing Hazards from Stored Spent Power-Reactor Fuel in the United States. Science and Global Security journal, posted on-line at: [http://www.princeton.edu/~globsec/publications/pdf/11\\_1Alvarez.pdf](http://www.princeton.edu/~globsec/publications/pdf/11_1Alvarez.pdf) and Board on Radioactive Waste Management, National Academy of Sciences, 2005. “Safety and Security of Commercial Spent Nuclear Fuel Storage” (public report).

<sup>14</sup> Conversely, waste that has less than 5 years in liquid storage is too thermally hot to put in dry storage.

<sup>15</sup> Kamp, Kevin, 2004. “Get the Facts on High-Level Atomic Waste Storage Casks.” Nuclear Information and Resource Service. Posted at: <http://www.nirs.org/radwaste/atreactorstorage/drycaskfactsheet07152004.pdf>, and “Summary of Oscar Shirani’s Allegations of Quality Assurance Violations Against Holtec Storage/Transport Casks.” Compiled by Kevin Kamps, 2004. Posted at: <http://www.nirs.org/radwaste/atreactorstorage/shiranialleg04.htm>

<sup>16</sup> Currently there is no real-time monitoring of these installations at reactor sites in the U.S.

<sup>17</sup> At Palisades in Michigan the containers are in clear view 150 yards from the water of Lake Michigan with no restriction on boat access; at Brown’s Ferry in Alabama, the waste is on a pad next to the fence on a deserted, but public country road; on Prairie Island, the waste containers are like bowling pins lined up across the street from the Prairie Island Indian Community Day Care Center. Many other sites are similarly vulnerable at this moment. Irradiated fuel in a single dry cask is sufficient source-term to create a clear and present danger to anyone downwind if the material were dispersed and would create an enormously expensive clean-up.

<sup>18</sup> Current regulations of the U.S. NRC do not require any of the above.



a fair review of radioactive waste policy, particularly if future policy is to rely upon further storage at these sites.

We do not, however, support the continued generation of more radioactive waste—whether by extending the licenses of the existing reactors, expansion of the existing sites with the addition of new reactors, or from new reactor sites. Many of the undersigned are active intervenors in the proposed licenses for new reactors in part because generation of this very troubling waste is not an acceptable by-product of making electricity.

Today the cost of a new nuclear power plant is on par with retail prices for solar panels.<sup>19</sup> “Nega-watts<sup>20</sup>” generated through aggressive efficiency upgrades and standards for new construction are more than 10 times cheaper than building new reactors<sup>21</sup> and also deliver far greater and more rapid reductions in Greenhouse Gas Emissions. When good design is employed, all new construction in the United States could be “net-zero<sup>22</sup>” and retro-fits of existing buildings could reverse demand projections, obviating the need for expanded nuclear generation.

We look forward to working with you, your Department of Energy, Environmental Protection Agency, Council on Environmental Quality, and with Congress to explore options for the nuclear waste we have today. We will work diligently, and hope you and your administration will join us, as we anticipate that an honest, rational, science-based analysis of policy will show that when it comes to radioactive waste, prevention is the best medicine. We would like to work with you to stop the expanded production of this waste for which there truly is nothing except responsible long-term stewardship to achieve the goal of isolation—ensuring that it does not enter our air, our water, our food, or our children.

Sincerely,

Cc: The Honorable:

Vice President Joe Biden  
Secretary of Energy Steven Chu  
Senate Majority Leader Harry Reid  
Speaker of the House Nancy Pelosi  
Senator Barbara Boxer  
Senator John Ensign  
Representative Henry Waxman  
Representative Ed Markey

<sup>19</sup> Citations provided in Got.Solar! Fact sheet posted at: <http://www.nirs.org/factsheets/gotsolar.pdf>

<sup>20</sup> Coined by Amory Lovins, Rocky Mountain Institute, a “Nega-Watt” is a Watt of energy that was previously required to do a certain task, which is no longer required, thanks to energy efficiency or conservation.

<sup>21</sup> Lovins, Amory, 2008. “Forget Nuclear.” Rocky Mountain Institute. Posted at: <http://www.rmi.org/sitepages/pid467.php>

<sup>22</sup> Net Zero cite

Representative Shelley Berkeley  
Representative Titus  
Representative John Hall  
Secretary of the Interior Ken Salazar  
Council on Environmental Quality Nancy Sutley

Commissioners of the US Nuclear Regulatory Commission

**Organizational Signers**

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Takoma Park, MD

Kevin Kamps  
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Dixie van der Kamp  
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Anne Dunlap Pastor  
Comunidad Liberación/Liberation Community  
Denver, CO

Nancy Burton  
CT Coalition Against Millstone  
Redding Ridge, CT

Jane Latus  
Canton Advocates for Responsible Expansion  
Canton, CT

Judi Friedman  
PACE (People's Action for Clean Energy, Inc.)  
Canton, CT

Starling Childs  
Berkshire Litchfield Environmental Council  
Norfolk, CT

Jana Stacy  
Florida American Indian Movement  
Ft Lauderdale, FL

Dale Gulden  
Solar Direct, Inc.  
Bradenton, FL

Jesse Glickstein  
Faiths United for Sustainable Energy (FUSE)  
Miami, FL

Todd Dripps  
Everglades Earth First!  
Palm City, FL

Barry Parsons  
Environmental Alliance of North Florida  
Madison, FL

Marilyn J. Blackwell  
Help Save The Apalachicola River Group  
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Bobbie Paul  
Georgia Women's Action for New Directions  
(WAND)  
Atlanta, GA

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Nuclear Watch South

Atlanta, GA

Alex McNish  
Idaho Mediation Association, Inc.  
Boise, ID

Louis Landry  
Snake River Alliance  
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Carolyn Treadway  
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Regional Assoc. of Concerned Environmentalists  
Brookport, IL

Alesha Boyer  
Collector's Shop  
Zion, IL

David Borris  
North Suburban Peace Initiative  
Highland Park, IL

Carol Stark  
Citizens Against Ruining the Environment,  
C.A.R.E.  
Lockport, IL

John Blair  
Valley Watch, Inc.  
Evansville, IN

Ann Suellentrop  
Physicians for Social Responsibility - KC  
Kansas City, KS

Nancy Givens, CoChair  
BGGreen Partnership for a Sustainable  
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Alliance for Affordable Energy  
New Orleans, LA

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Greenfield Solar Store  
Gill, MA

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Shelburne Falls, MA

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Colrain, MA

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Kevin Zeese  
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Chesapeake Safe Energy Coalition  
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Scarborough, ME

Marjorie Vangness  
Dominican Sisters  
Grand Rapids, MI

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Coalition for a Nuclear-Free Great Lakes  
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Mankato Area Environmentalists  
Mankato, MN

Lynne Mayo  
Peace with Justice Neighborhood Committee  
Minneapolis, MN

Jan Conley  
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 Harbhajan, Sandhu, Santa Rosa Valley, CA  
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 kolempas, Georgios, Volos, no  
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 Dolores, Pieper, Franklin, IN  
 colman, manning, s paris, ME  
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 Richard, Buck, Georgetown, TX  
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 Lisa, Woodhams, conesus, NY  
 cara, busch, cherry log, GA  
 Kathy, Weinstock, Newburyport, MA  
 Andrew, Nelson, Oswego, NY  
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 Patience, Robbins, Mount Rainier, MD  
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 Shari, katz, Westmont, IL  
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 andrew, hanscom, nederland, CO  
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 stefanie, smith, toms river, NJ  
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 mitch, brown, decatur, GA  
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 Rox, Fowlie, harmony, ME  
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 Philip, Anderson, Crozet, VA  
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## Principles for Safeguarding Nuclear Waste at Reactors

The following principles are based on the urgent need to protect the public from the threats posed by the current vulnerable storage of commercial irradiated fuel. The United States does not have a near-term solution for the permanent storage of high-level nuclear waste. The proposed Yucca Mountain site is unsafe for geologic storage of nuclear waste and the program remains mired in bad science, mismanagement, and yet another design overhaul. Even if licensed, Yucca Mountain could not legally contain all of the waste produced by existing reactors. Under the U.S. Department of Energy's unrealistically optimistic scenario, Yucca Mountain is not predicted to begin receiving waste until at least 2017 and transporting waste to the site would take more than 30 years. Meanwhile, irradiated fuel at reactor sites remains vulnerable to accidents and attacks.

The undersigned organizations' support for improving the protection of radioactive waste stored at reactor sites is a matter of security and is in no way an indication that we support nuclear power and the generation of more nuclear waste.

- ◆ **Require a low-density, open-frame layout for fuel pools:** Fuel pools were originally designed for temporary storage of a limited number of irradiated fuel assemblies in a low density, open frame configuration. As the amount of waste generated has increased beyond the designed capacity, the pools have been reorganized so that the concentration of fuel in the pools is nearly the same as that in operating reactor cores. If water is lost from a densely packed pool as the result of an attack or an accident, cooling by ambient air would likely be insufficient to prevent a fire, resulting in the release of large quantities of radioactivity to the environment. A low-density, open-frame arrangement within fuel pools could allow enough air circulation to keep the fuel from catching fire. In order to achieve and maintain this arrangement within the pools, irradiated fuel must be transferred from the pools to dry storage within five years of being discharged from the reactor.
- ◆ **Establish hardened on-site storage (HOSS):** Irradiated fuel must be stored as safely as possible as close to the site of generation as possible. Waste moved from fuel pools must be safeguarded in hardened, on-site storage (HOSS) facilities. Transporting waste to interim away-from-reactor storage should not be done unless the reactor site is unsuitable for a HOSS facility and the move increases the safety and security of the waste. HOSS facilities must not be regarded as a permanent waste solution, and thus should not be constructed deep underground. The waste must be retrievable, and real-time radiation and heat monitoring at the HOSS facility must be implemented for early detection of radiation releases and overheating. The overall objective of HOSS should be that the amount of releases projected in even severe attacks should be low enough that the storage system would be unattractive as a terrorist target. Design criteria that would correspond to the overall objective must include:
  - Resistance to severe attacks, such as a direct hit by high-explosive or deeply penetrating weapons and munitions or a direct hit by a large aircraft loaded with fuel or a small aircraft loaded with fuel and/or explosives, without major releases.
  - Placement of individual canisters that makes detection difficult from outside the site boundary.

- ◆ **Protect fuel pools:** Irradiated fuel must be kept in pools for several years before it can be stored in a dry facility. The pools must be protected to withstand an attack by air, land, or water from a force at least equal in size and coordination to the 9/11 attacks. The security improvements must be approved by a panel of experts independent of the nuclear industry and the Nuclear Regulatory Commission.
- ◆ **Require periodic review of HOSS facilities and fuel pools:** An annual report consisting of the review of each HOSS facility and fuel pool should be prepared with meaningful participation from public stakeholders, regulators, and utility managers at each site. The report must be made publicly available and may include recommendations for actions to be taken.
- ◆ **Dedicate funding to local and state governments to independently monitor the sites:** Funding for monitoring the HOSS facilities at each site must be provided to affected local and state governments. The affected public must have the right to fully participate.
- ◆ **Prohibit reprocessing:** The reprocessing of irradiated fuel has not solved the nuclear waste problem in any country, and actually exacerbates it by creating numerous additional waste streams that must be managed. In addition to being expensive and polluting, reprocessing also increases nuclear weapons proliferation threats.

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Foundation

#### **California**

Rochelle Becker, Executive  
Director  
Alliance for Nuclear  
Responsibility

Pamela S. Meidell, Director  
Atomic Mirror

Jon Rainwater, Executive  
Director  
California Peace Action

Enid Schreiber, Co-Director  
Center for Safe Energy

Daniel Hirsch, President  
Committee to Bridge the Gap

Molly Johnson, Area  
Coordinator  
Grandmothers for Peace, San  
Luis Obispo County Chapter

Jennifer Viereck  
HOME (Healing Ourselves &  
Mother Earth)

Michael Welch  
Redwood Alliance

Leuren Moret, Independent  
Radiation Specialist  
Environmental Commissioner  
City of Berkeley  
Radiation and Public Health  
Project

Jill ZamEck and Jane Swanson  
San Luis Obispo Mothers for  
Peace Action Committee

Kathleen Gwynn  
President & CEO  
Steven and Michele Kirsch  
Foundation

Linda Seeley, President  
Terra Foundation

Marylia Kelley, Executive  
Director  
Tri-Valley CAREs  
(Communities Against a  
Radioactive Environment)

#### **Colorado**

Paula Palmer, Executive  
Director  
Global Response

LeRoy Moore, Ph.D.  
Rocky Mountain Peace and  
Justice Center

#### **Connecticut**

Jane Latus, Vice President  
Canton Advocates for  
Responsible Expansion

Lynn Johnson, President  
Center for Serenity

Nancy Burton, Director  
Connecticut Coalition Against  
Millstone

Judi Friedman, Chair  
PACE (People's Action For  
Clean Energy)

Sal Mangiagli & Rosemary  
Bassilakis  
CT CAN

#### **Florida**

Bob Tancig, State Coordinator  
Florida Coalition for Peace and  
Justice

#### **Georgia**

Adele Kushner, Executive  
Director  
Action for a Clean  
Environment

Bobbie Paul, Director  
Atlanta WAND (Women's  
Action for New Directions)

Abayomi Noibi, Ph.D.,  
Executive Director  
Environmental Community  
Action, Inc. (ECO-Action)

Bob Darby, Coordinator  
Food Not Bombs/Atlanta

Steve Leeper, Executive  
Director  
Global Peacemakers  
Association

Glenn Carroll, Coordinator  
Nuclear Watch South

**Idaho**

Jeremy Maxand, Executive  
Director  
Snake River Alliance

**Illinois**

David A. Kraft, Director  
Nuclear Energy Information  
Service (NEIS)

Carolyn Treadway  
No New Nukes

**Indiana**

Grant Smith, Executive  
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Citizens Action Coalition of  
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**Iowa**

Merle P. Prater, Ph.D.  
Founder/Principal  
Integrative Educational  
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**Kansas**

James M Nordlund,  
Communications Director  
Kansas Chapter of the National  
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Ruby English  
Active Citizens for Truth  
(ACT)

Mary Davis, Director  
Yggdrasil, a project of Earth  
Island Institute

**Louisiana**

Karen Wimpelberg, Board  
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Alliance for Affordable Energy

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Harden, Co-Directors  
Advocates for Environmental  
Human Rights

**Maine**

Bruce K. Gagnon, Coordinator  
Global Network Against  
Weapons & Nuclear Power in  
Space

**Maryland**

Jay. J. Levy, chair  
Nuclear Free Takoma Park  
Committee

**Massachusetts**

Sandra Gavutis, Executive  
Director  
The C-10 Research and  
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Deb Katz, Director  
Citizens Awareness Network

Carol Dwyer, Co-Chair  
Grassroots Actions for Peace

Mary Lampert, Director  
Pilgrim Watch

**Michigan**

Keith Gunter  
Citizens' Resistance at Fermi  
Two

Michael J. Keegan  
Coalition for a Nuclear Free  
Great Lakes

Alice Hirt  
Don't Waste Michigan

John Ephland  
KNOW (Kalamazoo Non-  
violent Opponents of War)

Sarah Nash, Assistant to the  
Coordinator  
IHM Justice Peace and  
Sustainability Office

Lynn Howard Ehrle, Chair  
International Science Oversight  
Board (a project of the Organic  
Consumers Association)

Betsy Winkelman, Chair  
Michigan Coalition on the  
Environment and Jewish Life  
(MI-COEJL)

Vicki Levengood, Michigan  
Representative  
National Environmental Trust

**Minnesota**

Judi Poulson, Chair  
Fairmont Peace Group

Gladys Schmitz, SSND  
Mankato Area  
Environmentalist, Coordinator

George Crocker, Executive  
Director  
North American Water Office

Bruce A Drew, Steering  
Committee  
Prairie Island Coalition

**Missouri**

Kathleen Logan Smith,  
Executive Director,  
Missouri Coalition on the  
Environment

**Nebraska**

Tim Rinne  
Executive Director  
Nebraskans for Peace

**Nevada**

Peggy Maze Johnson,  
Executive Director  
Citizen Alert

Tony Guzman, Outreach  
Director  
Nevada Conservation League

Judy Treichel, Executive  
Director  
Nevada Nuclear Waste Task  
Force



### **New Hampshire**

Chris Nord  
NH CAN

### **New Jersey**

Norm Cohen, Executive  
Director  
Coalition for Peace and Justice  
UNPLUG Salem Campaign

### **New Mexico**

Joni Arends, Executive  
Director  
Concerned Citizens for Nuclear  
Safety

Jay Coghlan, Director  
Nuclear Watch of New Mexico

Don Hancock, Director,  
Nuclear Waste Safety Program  
Southwest Research and  
Information Center

### **New York**

Tim Judson  
Central New York CAN

Elaine Donovan, Co-Founder  
Concerned Citizens for Peace

Scott Cullen, Senior Policy  
Advisor  
GRACE (GrassRoots Action  
Center for the Environment)

Jason K. Babbie, Senior  
Environmental Policy Analyst  
NYPIRG - New York Public  
Interest Research Group

Ernest J. Sternglass, Ph.D.,  
President  
Radiation and Public Health

Lisa Rainwater, Ph.D., Indian  
Point Campaign Director  
Riverkeeper

### **North Carolina**

Louis Zeller, Campaign  
Coordinator  
Blue Ridge Environmental  
Defense League  
(also in SC, TN & VA)

Jim Warren, Executive  
Director  
NC WARN (North Carolina  
Waste Awareness & Reduction  
Network)

E.M.T. O'Nan, Director  
Protect All Children's  
Environment

Lewis E. Patrie, M.D., Chair  
Western North Carolina  
Chapter  
Physicians for Social  
Responsibility

Laura Sorensen, District  
Leader  
Western North Carolina Peace  
Keepers

### **Ohio**

Mark D. Stansbery, Secretary  
Community Organizing  
Center/For Mother Earth

Lisa Crawford, President  
Fernald Residents For  
Environmental Safety &  
Health, Inc. (FRESH)

Vina Colley, Co-Chair  
National Nuclear Workers for  
Justice

Vina Colley and Lorry Swain  
PRESS (Portsmouth/Piketon  
Residents for Environmental  
Safety and Security)

### **Oregon**

Chuck Johnson, Board  
Member  
Center for Energy Research

Paige Knight, President  
Hanford Watch

Gerald Pollet, JD, Executive  
Director  
Heart of America Northwest  
(also in Washington)

### **Pennsylvania**

Dr. Lewis Cuthbert, President  
Alliance For A Clean  
Environment

Karen H. Prather, Chair  
Concern About Radiation In  
the Environment (CARIE)

Ernest Fuller, Vice-Chairman  
Concerned Citizens for SNEC  
Safety (CCSS)

Eric Epstein, Coordinator  
EFMR Monitoring

Eric Epstein, Chairman  
TMI-Alert

### **South Carolina**

Louis Zeller, Campaign  
Coordinator  
Blue Ridge Environmental  
Defense League  
(also in NC, TN & VA)

Ruth Thomas, President  
Environmental Inc.

Susan Corbett, Conservation  
Chair  
SC Sierra Club

### **Tennessee**

Louis Zeller, Campaign  
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Blue Ridge Environmental  
Defense League  
(also in North Carolina, South  
Carolina & Virginia)

Ann Harris, Director  
We the People, Inc.

**Texas**

Lisa Doggett (MD, MPH)  
Austin Physicians for Social  
Responsibility

Richard Simpson, Executive  
Director  
La Paz Coalition

Doris Smith  
Panhandle Area Neighbors and  
Landowners

**Utah**

Vanessa Pierce, Director  
HEAL Utah

Pete Litster, Executive Director  
Eileen McCabe, Associate  
Director  
Shundahai Network

**Vermont**

Chris Williams  
VT CAN

**Virginia**

Louis Zeller, Campaign  
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Blue Ridge Environmental  
Defense League  
(also in NC, SC & TN)

Elena Day, Founding Member  
People's Alliance for Clean  
Energy (PACE)

**Washington**

Gerald Pollet, JD, Executive  
Director  
Heart of America Northwest  
(also in OR)

Tom Carpenter, Director,  
Nuclear Oversight Program  
Government Accountability  
Project

**Wisconsin**

Dennis Dums, Research  
Director  
Citizens Utility Board

John LaForge, Co-director  
Nukewatch

George Paz Martin, Program  
Director  
Peace Action Wisconsin

Amy Schulz, RN, President  
Physicians for Social  
Responsibility Wisconsin

Judy Miner, Office Coordinator  
Wisconsin Network for Peace  
and Justice

Al Gedicks, Executive  
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Wisconsin Resources  
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For more information, contact Michele Boyd at Public Citizen ([mboyd@citizen.org](mailto:mboyd@citizen.org) or  
202-454-5134).



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Chairman Kleen  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear FOIA Requester:

The FOIA Improvement Act of 2016, which was enacted on June 30, 2016, made several changes to the Freedom of Information Act (FOIA). Federal agencies must revise their FOIA regulations to reflect those changes by December 27, 2016. In addition to revising our regulations, we intend to update the Form 464, which we use to respond to FOIA requests.

In the interim, please see the comment box in Part I.C of the attached Form 464. The comment box includes information related to the recent changes to FOIA that is applicable to your FOIA request, including an updated time period for filing an administrative appeal with the NRC.

Sincerely yours,

*Stephanie Blaney /S/*

Stephanie Blaney  
FOIA Officer (Acting)