

NUCLEAR ADVISORY COUNCIL THURSDAY JANUARY 14, 2016

My name is Suzanne Rhodes, and I am representing myself today. I wish to share my background and what I think is going on. Thank you very much for the opportunity to speak.

I wrote a thesis proposing state policy regarding Savannah River Site wastes, and it found its way to Governor Riley's kitchen cabinet. I ended up on the State's Crystalline Rock Project team; the purpose of this multi-state effort was to determine three potential geologic repositories for nuclear wastes. The political determination to establish Yucca Mountain was a result of buck passing and Congressional dithering over the Nuclear Waste Policy Act. Informally this decision was called "Screw Nevada."

Since then, a series of Nevada Governors and Nevada Attorneys General have consistently opposed Yucca Mountain. This was before Harry Reid was a Senator. Nevada hired the smartest and most aggressive of the multi-state Crystalline Rock team, and Nevada proceeded to outwit the rest of us.

One of the Yucca Mountain impediments was officially recognized by NRC last year - DOE lacks access to land to allow railroad tracks to transport spent fuel to Yucca Mountain. There are other issues, but this is a show stopper. If you have seen maps of rails to Yucca Mountain, they are just planning maps. The glorious photos of rails into the mouth of the site - are light rail. They were designed to transport workers & equipment - and perhaps some of you. The original tunnel was to be 40 miles long - and if the repository was to be doubled in size, as Congress suggested, it would have been 80 miles long. It is now 7 miles long now, with a 2-mile spur to store equipment.

There is a long list of congressional neglects of nuclear high-level waste policies, including undependable appropriations to DOE for Yucca Mountain development. This persistent funding problem led to exceedingly high staff resignations, subsequently leading to congressional accusations that DOE mismanaged Yucca Mountain.

Years go by, and Congress continues to neglect nuclear waste issues.

We now find ourselves with SRS as a proposed recipient for commercial spent fuel from Germany, for Exelon spent fuel from Illinois, and for international plutonium wastes which should rightfully go back to the UK & France. Headquarters offices of both the NRC and DOE have secretly suggested sending inappropriate wastes to SRS. Long-standing rules, public policies, and laws are now routinely ignored in the apparently steady effort to make the SRS an international nuclear waste dump. Keep in mind that Congress has broken funding agreements with SC to treat SRS legacy tanks, which will now require management for at least 20 more years. If any proposals to import and treat other wastes are successful, cleanup will take longer. More waste treatment usually means using these nasty old tanks.

So Screw Nevada has evolved into Screw SC.

What **should** be happening? I think it would be very productive if industry & our political leaders were working with NRC & Congress on a program to design and license much needed, long-term, transportable, thick-walled casks for spent fuel. Germany, Japan (at Fukushima), and most other countries use casks up to 20" thick. They also store them in hardened buildings. To be most safe and fair, US casks would be stored at the site of generation until a repository has been developed - and SRS wastes would be stored here. Some sort of transfer of ownership to the feds would need to be folded into the storage process for commercial spent fuel.

AND a repository needs to be developed. I have read credible reports that it could take 60 years to develop a repository.

I sincerely hope that some of you are concerned, and can somehow move the 'powers that be' to develop responsible nuclear waste storage policies that do not depend upon South Carolina. They are much needed.

Thank you very much.

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South Carolina Sierra Club



South Carolina Governor's Nuclear Advisory Council
1200 Senate Street,
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Members of the Nuclear Advisory Council,

Please accept these comments on behalf of the South Carolina Sierra Club.

The plutonium that the U.S. DOE has decided to send to South Carolina is not nuclear non-proliferation. As much of the plutonium did not originate in the U.S., it means that once again the DOE is making decisions without a sufficient stakeholder process, allowing our state to continue as a dumping ground for nuclear materials that are difficult to manage. The plutonium would be shipped into Charleston harbor in various quantities over a period of seven years from Japan, Germany, Switzerland and several other countries. Already, plans are in motion to bring in 730 pounds of plutonium now stored in Japan. And, to make matters even worse, the DOE is planning to bring high-level waste from Canada and Germany to the SRS.

On arrival at the SRS, there will be no viable disposal path for the plutonium, as the project to make plutonium fuel (MOX) from much of the thirteen metric tons of plutonium already at SRS is no longer viable. The alternative of processing it as waste is uncertain and unfunded. Because it is required by federal law, South Carolina has anticipated that plutonium shipments out of the state would begin on January 1, 2016. Governor Nikki Haley has recognized that MOX has failed and rightly has asked DOE to meet that legal obligation or pay \$1 million per day in fines.

Plutonium is one of the most toxic man-made substances in the world, and it only takes a softball size amount to make a nuclear bomb. Even tiny amounts in the environment are deadly and carcinogenic when ingested. By storing large amounts of plutonium at SRS with no known exit strategy, the DOE is putting all of South Carolina at risk for a long time.

Governor Haley has been clear that she does not want SRS to be a dumping ground for nuclear waste and has told the DOE that "South Carolina cannot stand idly by while the DOE violates federal laws and fails to fulfill its commitment to the State." We couldn't agree more, and we commend her for taking that position and for holding the DOE to the removal of plutonium and the clean up the site in a timely manner. She took a similar position earlier this year when she publicly denounced any effort to re-open the Barnwell nuclear dump for any more waste at the site.

We urge the Nuclear Advisory Council to stand by the Governor's decision that more incoming plutonium is not in the benefit of South Carolina's future. Additionally, we implore the termination of the MOX facility.

Respectfully submitted,

Chris Hall, Chair
SC Sierra Club

Copied: Members of the SC Nuclear Advisory Council



THE LEAGUE OF WOMEN VOTERS OF SOUTH CAROLINA
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COMMENTS TO THE GOVERNOR'S NUCLEAR ADVISORY COUNCIL

14 January 2015

The League of Women Voters of South Carolina has been active in advocacy related to nuclear facilities in South Carolina for more than thirty years. We have published several studies of the issues related to nuclear storage in our state, first in 1997 in Dr. Mary T. Kelly's document *The Aging of the Nuclear State: A Survey of South Carolina's Nuclear Utilities* and more recently, in 2013, *Nuclear Waste in South Carolina: An Issue Brief for Citizens*. On November 20, 2010, the League's State Board authorized a policy opposing the use of the Savannah River Site (SRS) as a storage site for commercial spent fuel.

We are here today to oppose disposition of international and interstate commercial nuclear waste in South Carolina. Plans to bring commercial fuel to SRS from Germany and from Illinois are contrary to decades of policy dictating separation of commercial and defense waste storage. Further, this is not necessary. Germany could be a leader in European Union planning for EU wastes. German waste could be treated and disposed of internally, but treatment cost reimbursement from Germany seems to have influenced DOE decision-making. Similar funding responsibility has not been required of Hanford, Los Alamos, or other labs. The Illinois waste to be sent to SRS is also unnecessary, the product of a commercial company's failure to develop and carry out its own local disposition plan, as other more responsible power companies have done.

From the beginning of the nuclear age, United States' commercial power wastes have been the responsibility of the US government. The Department Of Energy (DOE) and its predecessor agencies have been charged with this responsibility, but it is Congress that establishes policies and appropriates funds. Sadly, funding has been inadequate and progress has been very limited. The United States government has not met its responsibilities, and South Carolina is paying the price.

Why do both DOE and the Nuclear Regulatory Commission (NRC) propose to send commercial spent fuel to SRS, a weapons site, despite decades-old policies to separate commercial and defense activities? And why are these agencies using tactics that appear to ignore existing public policy and procedures? We strongly urge our state government to oppose these efforts to turn South Carolina into a dumping ground for commercial nuclear wastes.

The most recent LWVSC report on nuclear wastes in South Carolina is available at <http://www.lwvsc.org/files/nuclearwaste20140116.pdf>

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.