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Docket Number:	15-IEPR-12
Project Title:	Nuclear Power Plants
TN #:	204428
Document Title:	Sierra Club Angeles Chapter Statement on Interim Storage of Spent Nuclear Fuel
Description:	N/A
Filer:	Patty Paul
Organization:	Sierra Club
Submitter Role:	Public
Submission Date:	4/29/2015 10:14:20 AM
Docketed Date:	4/28/2015

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4/25/15

**Sierra Club Angeles Chapter
Statement to the California Energy Commission
on Interim Storage of Spent Nuclear Fuel**

Dear Chairman Ogelsby and CEC Members:

California has developed a reputation as a leader on energy issues, largely thanks to the work of the CEC. For several years I served as Coordinator of the West Coast Corridor Coalition, a clean transportation group, and had the privilege of working with CEC staff on electrification of transportation.

Today I am writing in my capacity as Sierra Club Angeles Chapter (SCAC) Task Force Chair on Decommissioning the San Onofre Nuclear Power Plant.

Since 1983 the Sierra Club at the National level has had a strong position supporting identification, development and operation of one or more remote geologic repositories for long-term storage of nuclear waste. Our position is based on the environmental risks of storage at individual plant sites, and the environmental need to utilize the safest possible methods of storage as a matter of national policy.

Neither the Sierra Club nor the Angeles Chapter have taken a position on interim storage, in part because only recently has that emerged as a potential element in long-term management of spent nuclear fuel. Moreover, the Sierra Club has had a concern that interim storage initiatives might distract from efforts toward locating remote repositories. Indeed, to truly be "interim," these facilities must be seen in relation to actual or intended ultimate destinations. It should also be noted that interim storage would involve an additional step in the transport process, which carries its own unique challenges.

With those caveats, in my capacity as San Onofre Task Force Chair, I wish to commend several groups and individuals, including David Victor and other officers of the Citizens Engagement Panel on San Onofre, and Ray Lutz of Citizens Oversight, Inc., for submitting statements to the CEC on interim storage.

Their statements have the great merit of seeking to restore a productive climate of discussion in which nuclear waste management options can be explored. The hiatus of political stalemate at the national level requires fresh thinking by progressive states, to develop options and to restore momentum to the decision-making process.

The issue is particularly urgent with regard to San Onofre, which is the perhaps the most exposed nuclear waste storage site in the U.S. – a small piece of land wedged between Interstate 5 and the Pacific Ocean, vulnerable to earthquakes, tsunamis, urban transportation networks, and facing the nearly unmanageable challenge of developing an evacuation plan for local and regional populations that total 8.4 million within a 50 mile range. Thus, the case for removal of waste from this site is particularly strong.

Those parties filing statements with the CEC on this issue have put forward a number of concepts, including establishing relations with private operators of nuclear waste management sites, entering into efforts and joint agreements with states such as Oregon and Washington that also have decommissioned plants, and states such as Utah and Texas that have actual or proposed interim storage sites.

Clearly, there is value in vetting and exploring a wide range of alternative approaches. And since interim sites are not an ultimate substitute for remote repositories, there may be merit in closely considering the following principles and concepts:

1. Giving so-called “stranded fuel” from decommissioned reactors priority access to interim sites. In California there are three such locations and some day Diablo Canyon will join them as the fourth.
2. Giving priority to identifying potential sites within California, where California environmental requirements and other laws apply. While this would narrow the list of potential sites, it would also remove the need to negotiate with other states and provide California with the ability to set standards for transport and on other key issues.
3. Including for review California’s uniquely large number of military bases. Most are experienced in handling explosives and other hazardous material, and maintaining high security including no-fly zones. Many of these bases are in deserts and other remote locations. Moreover, San Onofre nuclear waste is currently on a military base – Camp Pendleton. While recognizing that a military base location might involve challenging negotiations with DOD and the federal government, it is possible that direct transfer between two military facilities might be accomplished, especially given that DOD must deal with storing military nuclear waste as an ongoing concern.
4. If one or more interim storage sites is established, its operational practices should be continuously monitored not only for safety but to capture experience applicable to successful design of permanent repositories. Ideally, this evolving body of knowledge will lower the barriers to identifying permanent storage sites.

Adding elements such as these to the mix can be consistent with maintaining the focus on remote geologic storage as ultimately the safest and most responsible solution. Given San Onofre's uniquely unsuitable characteristics, it appears appropriate to explore a wide range of options on removing spent fuel from that location.

On behalf of the SCAC's San Onofre Task Force, I commend those who are offering such options and commend the CEC for addressing this issue. Thank you for considering the above concerns and suggestions.

Sincerely, 

Glenn Pascall, Chair
San Onofre Task Force
Sierra Club Angeles Chapter