

2009 Report of Oversight Activities and Funding
of the
The Interim Spent Fuel Storage Facility Oversight Fund
prepared for
**Joint Standing Committee on
Utilities and Energy**

Pursuant to 22 MRSA §670

EXECUTIVE SUMMARY

The following report will specifically detail the costs and activities, conducted under the Interim Spent Fuel Storage Facility Oversight Fund (the Fund), for calendar year 2009. The reporting parties are the Department of Environmental Protection, the Department of Health and Human Services, the Office of the Public Advocate, the Department of Public Safety, and Maine Yankee (the Oversight Group). Each of the organizations represented on the group has been given a section of this report to address any specific activities over the term. We do not recommend changing the funding level, as stated in [22 MRSA §669](#), at this time. Though we presently have some stranded costs, we also have a decreasing budget and the August 2008 departure of the State Nuclear Safety Advisor, we feel that the present State Assessment will be enough to payoff this financial liability within 3 years. We have included an expected biennial budget for the Oversight Group and we expect to decrease the stranded costs over this time period. There is one member of the Oversight group that has not been retained, which is the Independent Radiological Expert. We have all discussed this and agreed to wait until an issue arises to procure the services of such an expert. This decision was made primarily to save money and because we don't presently have any issues to review.

Environmental Protection

Chemical Sampling

The three-year background chemical monitoring program has ended with the submittal of the *Third Annual Report of Groundwater Monitoring of Bailey Point, September 2007 – June 2008, With Three-Year Monitoring Overview and Trend Analysis, Wiscasset, Maine, December 16, 2008*. Additional chemical monitoring will be conducted every three years thereafter. The DEP has reviewed this report and no remedial action is planned. The chemical sampling program is scheduled to terminate 30 years from the first year of sampling in 2005 with final sampling conducted in years 2034 and 2035.

Radiological Sampling

The last radiological sampling is scheduled to be conducted in March and June of 2010. The Maine State Nuclear Safety Inspector has reviewed and commented on

radiological sampling components of Maine Yankee's *Third Annual Report of Groundwater Monitoring of Bailey Point, September 2007 – June 2008, With Three-Year Monitoring Overview and Trend Analysis, Wiscasset, Maine, December 16, 2008*. Maine Yankee will respond to comments in early 2010. Sampling for 2009 has been completed and an annual report submitted in December 2009. The 2009 report will be revised to incorporate the comments and responses for the 2008 report.

The following positions are referenced below in the table with the amounts of time spent on the following tasks:

Project Manager: Project orientation, attend meetings, coordinate communications with Department staff, Maine Yankee personnel and DHS, coordinate review of technical data by Department staff, monitor financial accounts, prepare correspondence.

Project Geologist: Review and comment on technical issues. Monitor groundwater quality data.

Project Chemist: Review and comment on technical issues. Monitor quality assurance for analytical data.

Database Manager: Configure analytical data for the Department's EGAD database.

Environmental Supervisor: Project orientation, assist Project Manager.

Division Director: Assist Environmental Supervisor and Project Manager.

Clerical Support: Clerical personnel support for copying, mailing, phone communications.

Position/Title	Hourly Rate 2009	Estimated Hours 2009 (3)	Estimated Salary 2009	Total Costs 2008 (1)
Project Manager (ES III)	20.50	300	6,150	
Project Geologist (Sr. Env. Hydrogeol.)	30.36	100	3,036	
Project Chemist (Chem III)	29.60	75	2,220	
Database Manager (Chem I)	20.04	12	240	
Environmental Supervisor (ES IV)	28.90	60	1,734	
Division Director	35.04	50	1,752	
Clerical Support (Clerk IV, Step 3)	15.77	25	394	
Subtotal, Salary			15,527	12,097
Estimated Benefits			5,170	6,039
Estimated Indirect			2,500	1,212 (2)
Grand Total			23,197	19,348

(1) Salary and benefits: actual through 11/19/08, estimated to end of 2008

(2) DEP reimbursed by Maine Yankee for lab analyses (\$1190)

(3) Based on Joan Jones' estimate for 08-09

Health and Human Services

Office of Nuclear Safety

The State Nuclear Safety Inspector (SNSI) is established by [Title 22 chapter 159-A](#). This chapter also requires the SNSI position to provide monthly reports, and an annual report of activities as well as an annual report regarding expenditures to the Legislature. These additional reports can be found here: www.maineradiationcontrol.org and may help answer any questions you have.

LEGISLATIVE MANDATES

- Submitted monthly reports to the Legislature for the months of December 2008 and January through November of 2009 on SNSI activities at the Maine Yankee site.
- Participated in the quarterly meetings of the oversight group overseeing the Maine Yankee site.
- Submitted annual accounting report of all revenues received and disbursements from the Interim Spent Fuel Storage Facility Oversight Fund to the Joint Standing Committee of the Legislature.
- Provided annual activities report for inclusion in the Radiation Control Program's Annual Oversight and Funding Report to the Joint Standing Committee of the Legislature.
- Submitted SNSI's Annual Activities Report to the Legislature.

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

- Performed periodic field replacements of air filters at the old Bailey Farm House.
- Performed quarterly TLD field replacements around the ISFSI and Bailey Cove.
- Evaluated and reported the results of the quarterly sampling of freshwater, saltwater, and seaweed samples analyzed by the State's Health and Environmental Testing Laboratory (HETL).
- Evaluated historical air filter data and technical merits of continued air sampling at the old Bailey Farm House. Discontinued air sampling station after 39 years.

DECOMMISSIONING

- Increased established \$10,000 contract with the State's consultant, a national expert on decommissioning, to complete remaining confirmatory reports to \$15,000.
- Provided voluminous information to State Consultant for the State's confirmatory report on final site walk down survey.
- Performed technical review and provided comments on the State's Yard West Part I Confirmatory Report.
- Performed technical review and provided comments on the State's Yard West Part II Confirmatory Report.
- Performed technical review and provided comments on the State's Final Walk-Down Survey Confirmatory Report.
- Performed walk-down survey of the East Access Road abutting the Independent Spent Fuel Storage Installation to assess ambient radiation levels for decommissioning closure.

GROUNDWATER MONITORING

- Submitted the State's annual list of well samples for State testing to Maine Yankee.
- Picked up well water samples as part of the State's quality assurance on the groundwater monitoring program and delivered the samples to HETL for analysis.
- Performed review of State's quality assurance results on well water samples, evaluated radiological consequences and trended their results.
- Reviewed and provided commentary on Maine Yankee's third annual groundwater monitoring report covering the period from September 2007 through June 2008.
- Reviewed and evaluated Maine Yankee's well water summary results from each sampling event from September 2008 through June 2009.
- Received Maine Yankee's fourth annual groundwater monitoring report covering the period from September 2008 through June 2009 and noted deficiencies in the reported information, which were resolved by Maine Yankee.

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI)

- Reviewed shift status reports on the ISFSI's daily operations.
- Participated in the Nuclear Regulatory Commission's (NRC) conference debrief of their security inspection of the ISFSI and reviewed their inspection report.
- Participated in the annual Emergency Plan training and exercise.
- Participated in periodic Maine Yankee communications drill with the State Police.
- Reviewed and commented, when appropriate, on Maine Yankee submittals to the U.S. NRC on Emergency Plan, revisions to the License Termination Plan, Annual Radiological Environmental Operating Report, Annual Effluent Release Report, Annual Decommissioning Funding Assurance Status Report, Annual Special Nuclear Material Report and Annual Individual Monitoring Report on personnel exposure.
- Reviewed Maine Yankee's submittal to the Department of Environmental Protection on its Environmental Covenant on the use of its Soil Management Plan.
- Reviewed Maine Yankee's submittal to the Riverbank Power Corporation on its proposed underground project.

OTHER NOTEWORTHY ACTIVITIES

- Participated in quarterly Federal Energy Regulatory Commission rate case settlement briefings.
- Participated in periodic briefs as the State's representative to the Northeast High Level Radioactive Waste Transportation Task Force (NEHLRWTF), an affiliate of the Council of State Governments, Eastern Regional Conference.
- Reviewed and commented on the U.S. Department of Energy's (DOE) National Transportation Plan (NTP) on spent nuclear fuel and high level waste. Comments were combined as part of the NEHLRWTF regional response to the DOE's NTP.
- Participated in bi-monthly Nuclear Waste Strategy Coalition conference calls on the national and congressional issues raised with the Obama Administration's opposition to the geologic repository at Yucca Mountain in Nevada and the de facto imposition of long term storage of spent nuclear fuel and high level waste at existing operating and decommissioned reactor sites.

- Presented annual update of the SNSI'S activities to the local representatives to the Maine Yankee Community Advisory Panel on Spent Nuclear Fuel and Storage.

State Nuclear Safety Inspector Projected Activities Report

Calendar Year 2010

1. Complete the annual oversight fund report to the Legislature.
2. Provide annual activities summary to the Radiation Control Program for inclusion in their annual report to the Legislature.
3. Submit monthly reports to the Legislature and other interested parties.
4. Review daily operations reports from the Independent Spent Fuel Storage Installation (ISFSI) for trends, issues, condition reports, etc.
5. Review and comment, if appropriate, on Maine Yankee's five annual reports to the U.S. Nuclear Regulatory Commission (NRC) or any other correspondence with the NRC.
6. Participate in the annual NRC inspection of the ISFSI, or any other NRC inspection.
7. Participate in the annual Maine Yankee emergency plan training and exercise.
8. Provide an annual update to local representatives on the Maine Yankee Community Advisory Panel.
9. Advise senior state officials on any spent fuel storage issues that may impact public health and safety.
10. Provide annual report to the Legislature on the State Nuclear Safety Inspector's activities for the previous calendar year.
11. Maintain an appropriate independent environmental surveillance program of the Maine Yankee environs.
12. Develop and issue the State's Confirmatory Summary of the Maine Yankee decommissioning in February/March timeframe.
13. Ensure all the data, analyses and reports issued by the State's decommissioning consultant are captured in a retrievable format for archiving.
14. Perform walk down survey of a 560 foot section on the East Access Road abutting the Jersey barriers and earthen mound by the ISFSI, provided ambient levels permit. Otherwise, consider implementing a systematic sampling program to finalize the road survey or providing closure pending review and evaluation of the data.
15. Develop a timetable for issuing eleven special technical reports covering historical operational and decommissioning events at Maine Yankee.
16. Issue a minimum of three of the eleven special technical reports.

17. Forward up to 30 selected soil samples to the Environmental Protection Agency (EPA) for in depth analysis of transuranics and hard-to-detect radioactive elements.
18. Evaluate distribution of radioactive environmental contaminants from the site characterization and marine sediment/tidal study samples.
19. Participate as the State's radiation expert to the Department of Environmental Protection's (DEP) on-going groundwater monitoring at Maine Yankee.
20. Review and comment on Maine Yankee's fourth and fifth annual groundwater reports.
21. Review the tri-annual groundwater sampling results of the groundwater monitoring sampling and provide feedback to DEP and Maine Yankee.
22. Report on the distribution of radioactive environmental contaminants from the site characterization and marine sediment/tidal study analyses.
23. Maintain appropriate duties from the terminated State Nuclear Safety Advisor position.
24. State representative to the Northeast High Level Radioactive Waste Transportation Task Force on spent fuel shipments.
25. Collaborate with State Archives in developing a storage and retrieval system for historical operating and decommissioning information on Maine Yankee.
26. Complete printing and binding of all photos of the Maine Yankee decommissioning.
27. Commence arrangements for the disposal of decommissioning soil samples.
28. Reassess the State's environmental surveillance program of the Maine Yankee environs.
29. Develop and implement a gamma/neutron survey plan.

Calendar Year 2011

1. Complete the annual oversight fund report to the Legislature.
2. Provide activities summary to the Radiation Control Program for inclusion in the annual report to the Legislature.
3. Submit monthly reports to the Legislature and other interested parties.
4. Review daily operations reports from the Independent Spent Fuel Storage Installation (ISFSI) for trends, issues, condition reports, etc.
5. Review and comment, if appropriate, on Maine Yankee's five annual reports to the U.S. Nuclear Regulatory Commission (NRC) or any other correspondence with the NRC.
6. Participate in the annual NRC inspection of the ISFSI, or any other NRC inspection.
7. Participate in the annual Maine Yankee emergency plan training and exercise.
8. Submit an annual report to the Legislature on the State Nuclear Safety Inspector's activities for the previous calendar year.

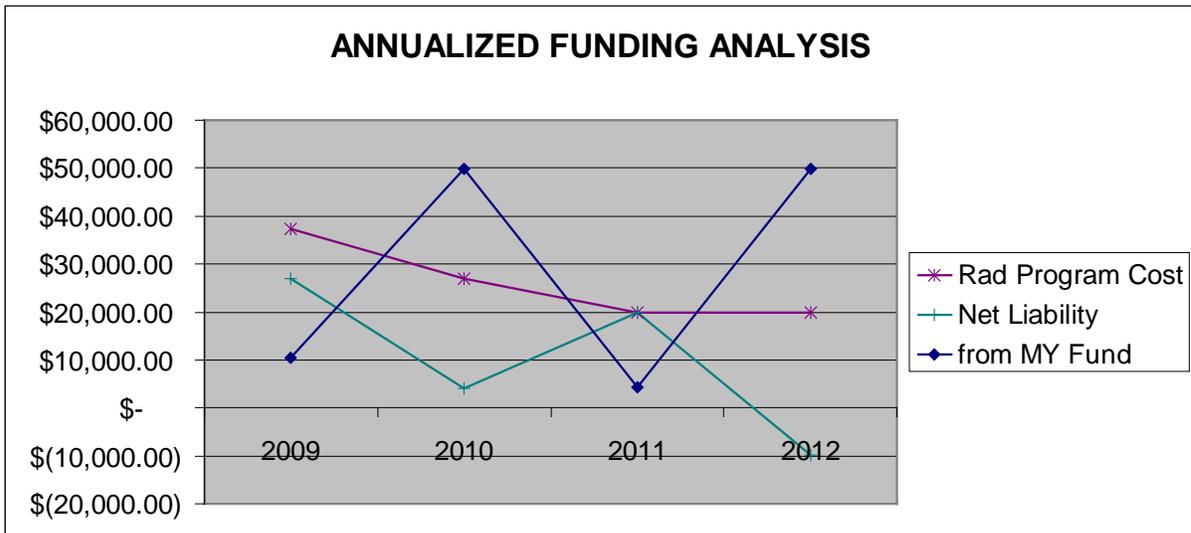
9. Review Maine Yankee's final status survey release reports and engineering calculations.
10. Request and review gamma survey information from the ICI sump and surveyed buildings.
11. Request and review appropriate ISOCS information for remediation or final status release.
12. Develop a list of state's lessons learned from the decommissioning.
13. Provide annual update to local representatives on the Maine Yankee Community Advisory Panel.
14. Advise senior state officials on any spent fuel storage issues that may impact public safety.
15. Report findings from either the field survey of the 560 foot section of the East Access Road abutting the ISFSI, or the sampling results from the systematic sampling of that section of the road.
16. Maintain an appropriate independent environmental surveillance program of the Maine Yankee environs.
17. Perform a gamma/neutron survey of the ISFSI.
18. Resolve any outstanding issues relative to Maine Yankee's fifth and final annual groundwater report and past reports.
19. Issue the remaining eight special technical reports.
20. Evaluate, assess, and report on the EPA's analytical results of the 30 selected soil samples that were tested for transuranic and hard-to-detect radioactive elements.
21. Issue a report on the gamma and neutron survey findings.
22. Participate as the State's radiation expert to the Department of Environmental Protection's (DEP) on any Maine Yankee issues.
23. Finalize with State Archives and implement a storage and retrieval system for historical operating and decommissioning information on Maine Yankee.
30. Forward appropriate State Nuclear Safety Inspector's files, (several hundred boxes), to State Archives.
24. Dispose of the decommissioning soil samples.
25. Issue a final, comprehensive decommissioning wrap-up report that encompasses the lessons learned, the specialized technical reports, the reviews of Maine Yankee and NRC documentation on final release records, the reviews of gamma and ISOCS information, the EPA findings on the transuranics and hard-to-detects analyses, the verification results, and the groundwater monitoring results.
26. Maintain appropriate duties from the terminated State Nuclear Safety Advisor position.
27. State representative to the Northeast High Level Radioactive Waste Transportation Task Force on spent fuel shipments.

Radiation Control Program

The Radiation Control Program was put in charge of the financial oversight of the Fund ([22 MRSA §668](#)) and regular meetings of the Oversight group as defined in [22 MRSA §670](#). The Oversight group met four times during 2009 (January 13, April 14, July 14, October 13).

The Radiation Control Program involvement is primarily through the program manager and will include the following activities that are budgeted to account for 17% of the manager's time:

- Review of State Nuclear Safety Inspector's monthly reports and annual report
- Billing and disbursement of Fund monies in accordance with budget.
- Monthly conference calls with Nuclear Waste Strategy Coalition
- Quarterly conference calls regarding Federal Energy Regulatory Commission rate case settlements and interim spent fuel storage alternatives.
- Annual meeting with Maine Yankee Citizen's Advisory Panel
- Annual Report to Legislature of Oversight group
- Quarterly meetings of the Oversight group
- Website management
- Quarterly environmental radiation samples



The very nature of the oversight program for the various agencies involved in the oversight causes financial swings in the bottom line from year to year for this fund. The Radiation Control Program has been absorbing these fluctuations due to the availability of other funds. We expect to be able to even out the fluctuations as time progresses and the overall programmatic costs are steadily decreasing. We have managed to stay within budget on all sections of the oversight program. The Radiation Control Program expects a continuing decrease in programmatic costs due to decreasing laboratory samples, and we are presently budgeting no increase in administrative costs which we expect will mean that in the near future the net financial liability shown on the graph will be brought to zero (presently expected in 2012). The

present financial assessment paid by Maine Yankee should be adequate for the next few years by our present calculations.

Public Advocate

The State Nuclear Safety Advisor in the Office of the Public Advocate left State service in August 2008. The two months of payroll and his outstanding vacation time accrual equaled \$48,931.00 which will be paid over a total of 4 quarters due to the decreasing income. The State Public Advocate has been attending the Oversight group meetings for continuity and will continue on this group as directed by PL 539.

Public Safety

During 2009, the State Police were not called upon to respond to any incidents at the facility. The response team continues to train and drill in order to be well-prepared in the event of a call for service.

The Department of Public Safety uses money from the Interim Spent Fuel Storage Facility Oversight Fund to purchase equipment that is directly related to the protection of public health and safety if the State Police respond to an incident at the Independent Spent Fuel Storage Facility. The periodic equipment purchases are necessary to replace equipment that is outdated and no longer provides the protection to the wearer due to its finite shelf life.

Maine Yankee

Spent Nuclear Fuel Removal/Disposal Update

The State of Maine and Maine Yankee Working Together

Since the early 1990's, Maine Yankee, the State of Maine and our congressional delegation have advocated together for the prompt removal of the spent nuclear fuel from the Wiscasset site by the U.S. Department of Energy as the DOE is required to do by contract and the Nuclear Waste Policy Act.

The State and Maine Yankee are both members of the Nuclear Waste Strategy Coalition (NWSC). The NWSC includes state utility regulators, state attorney generals, electric utilities and associate members representing 46 organizations from 26 states and Washington, D.C. Its mission: "To reform and adequately fund the U.S. civilian high-level nuclear waste transportation, storage, and disposal program in a manner that ensures timely and safe waste removal from operating and decommissioned nuclear power plants and that protects ratepayers' substantial investment in the program." Both the State and Maine Yankee participate in monthly conference calls and other activities of the NWSC.

On a quarterly basis the State and Maine Yankee both participate in a meeting of New England policy makers called the Interim Storage Alternatives Effort. This initiative

is part of the Federal Energy Regulatory Commission settlement agreements for Maine Yankee, Connecticut Yankee, and Yankee Rowe. Its purpose is to share information and to identify interim spent nuclear fuel storage alternatives outside New England.

Maine Yankee in consultation with the State is also a member of the Decommissioning Plant Coalition (DPC). The DPC is comprised of the three Yankee plants, and decommissioned plants in Wisconsin, Michigan, and California. The DPC is active in Washington, D.C. representing the unique interests of shutdown plants whose only function is the safe storage of spent nuclear fuel until the federal government honors its commitment to remove this material.

Advocating for Priority Removal of Spent Nuclear Fuel from Decommissioned Sites

During 2009 Maine Yankee and the State of Maine have had success making the case that spent nuclear fuel should be removed from decommissioned reactor sites like Maine Yankee on a priority basis. This would reduce the number of sites storing spent nuclear fuel, relieve the electric ratepayers of the cost to secure and store the spent nuclear fuel, and make these sites available for other useful purposes.

We have also worked with our Congressional delegation, the New England Governors, and others to encourage DOE Secretary Chu to include an expert with experience managing spent nuclear fuel at a decommissioned reactor site on the Blue Ribbon Commission that will study alternatives and make recommendations for the management and disposal of spent nuclear fuel.

Because a national disposal facility for spent nuclear fuel will not open perhaps for many years to come, we have also joined with others urging the development of interim storage outside New England for the spent nuclear fuel until such time as a national repository opens.

As Chair of the New England Governors' Conference, Governor Baldacci this fall led the effort on a December 18 letter from the New England Governors to DOE Secretary Chu. The letter, which is included with this report, states in part, "There is growing consensus that the expedited removal and consolidation of spent nuclear fuel and high-level nuclear waste from decommissioned sites is sound public policy. The Department of Energy has heard this message from, among others, members of New England's Congressional delegation; the New England Council; the Maine Public Utilities Commission; the National Association of Regulatory Utility Commissioners; the National Conference of State Legislatures; the National Commission on Energy Policy; the American Physical Society; the National Research Council; and the Nuclear Energy Institute."

Of note, in the last Legislative Session a resolution was unanimously approved that, among other points, "respectfully urge(s) the United States Government to immediately enact legislation expediting the establishment of 2 Nuclear Regulatory

Commission-licensed, private or government-owned interim storage facilities for used commercial nuclear fuel, with community incentives funded by the Nuclear Waste Fund, and requiring the Department of Energy to take possession of, safely transport and store used fuel at these facilities by leasing space at these facilities, and giving first priority to moving fuel from decommissioned plants.”

Also included at the end of this report is a growing list of excerpts from letters, reports, and resolutions with a similar message titled Statements Emphasizing the Need to Address the Spent Fuel Storage Issue at Decommissioned Nuclear Reactors.

National Status of Spent Nuclear Fuel Removal/Disposal

Under the Nuclear Waste Policy Act and contracts with utilities, in return for the U.S. Department of Energy removing the spent nuclear fuel from nuclear plant sites electric ratepayers who benefit from nuclear power pay for the disposal of the spent nuclear fuel. Since 1983 electric ratepayers including Maine Yankee’s have paid more than \$16 billion into the Nuclear Waste Fund which with interest now totals over \$33 billion. The federal government has yet to remove any spent nuclear fuel, though this was to have begun in 1998.

Since 1998, Maine Yankee and other utilities have sued the federal government for monetary damages resulting from DOE’s delay. The litigation is ongoing and likely to continue for some time; however, the courts have found DOE liable for proven damages resulting from the agency’s failure to start picking up the spent nuclear fuel. The question is how much. DOE estimates its liability at approximately \$12 billion through 2020.

Meanwhile, on June 3, 2008 the DOE submitted a License Application to the U.S. Nuclear Regulatory Commission for DOE’s proposed underground repository for spent nuclear fuel at Yucca Mountain, Nevada. That multi-year process is still proceeding; however, the Administration intends to end the Yucca Mountain program and appoint a Blue Ribbon Commission to study and recommend alternatives. It isn’t known yet what will happen with the Yucca Mountain License Application.

No matter what policy the Blue Ribbon Commission recommends a final repository will be needed for spent nuclear fuel, and the federal government’s liability for not fulfilling its commitment continues to grow with each passing day.

The State of Maine and Maine Yankee in coordination with Maine’s congressional delegation continue to monitor developments nationally and to participate with others advocating for the priority removal of spent nuclear fuel from decommissioned reactor sites like Maine Yankee.

**ESTIMATED POST DECOMMISSIONING OVERSIGHT EXPENDITURES AND
BUDGETED TRANSFERS FROM ACCOUNT 014-10A-2440-03**

	DEP 014-06A-1790-14	DHHS Safety Inspector 014-10A-2440-03	OPA SNSA 014-07H-0410-04	DPS STATE POLICE 014-16A-9513-04	DHHS DEH RCP 014-10A-2445-03	TOTAL	INCOME
<u>CY 2009</u>							
DEP - Radiological Program	20,000					20,000	
OPA - Nuclear Safety Advisor			13,931			13,931	
OPA- All Other						-	
DHHS- RCP					9,383	9,383	
DHHS - Safety Inspector		135,000				135,000	
DHHS - Contractor and Independent Expert							
DPS- Self contained Breathing app. (6)				30,000		30,000	
Sub - total	20,000	135,000	13,931	30,000	9,383	208,314	
DICAP - DHHS \$5,000/FTE		5,000			850	5,850.00	
Sta - cap rates OPA	0.006391		89			89.03	
Sta - cap rates DEP - Envir. Prot.	0.02088	418				417.60	
Sta - cap rates DHHS - Bur Health	0.03449	4,656			324	4,979.77	
Sta - cap rates DEP - State Police	0.01163			349		348.90	
Total Est. Sta-cap Exp.	418	9,656	89	349	1,174	11,685.30	
TOTALS	20,418	144,656	14,020	30,349	10,557	219,999.30	
CY 2009 FIRST QUARTER	\$ 10,100.00	\$ 34,900.00	\$ 10,000.00			\$ 55,000.00	\$ 55,000.00
CY 2009 SECOND QUARTER		\$ 40,980.00	\$ 4,020.00		\$ 10,000.00	\$ 55,000.00	\$ 55,000.00
CY 2009 THIRD QUARTER		\$ 24,651.00	\$ -	\$ 30,349.00		\$ 55,000.00	\$ 55,000.00
CY 2009 FOURTH QUARTER	\$ 10,318.00	\$ 39,125.00	\$ -		\$ 5,557.00	\$ 55,000.00	\$ 55,000.00

**ESTIMATED POST DECOMMISSIONING OVERSIGHT EXPENDITURES AND
BUDGETED TRANSFERS FROM ACCOUNT 014-10A-2440-03**

	DEP 014-06A-1790-14	DHHS Safety Inspector 014-10A-2440-03	OPA SNSA 014-07H-0410-04	PUS STATE POLICE 014-16A-9513-04	DHHS DEH RCP 014-10A-2445-03	TOTAL	INCOME
CY 2010							
DEP - Radiological Program	20,000					20,000	
OPA - Nuclear Safety Advisor						-	
OPA- All Other						-	
DHHS - RCP					47,273	47,273	
DHHS - Safety Inspector		135,000				135,000	
DHHS - Contractor and Independent Expert		5,000				5,000	
DPS - State Police						-	
Sub - total	20,000	140,000	-	-	47,273	207,273	
DICAP - DHHS \$5,000/FTE		5,000			850	5,850.00	
Sta - cap rates OPA	0.006391		-			-	
Sta - cap rates DEP - Envir. Prot.	0.02088	417.60				417.60	
Sta - cap rates DHHS - Bur Health	0.03449	4,828.60			1,630.45	6,459.05	
Sta - cap rates DEP - State Police	0.01163			-		-	
Total Est. Sta-cap Exp.	417.60	9,828.60	-	-	2,480.45	12,726.65	
TOTALS	20,417.60	149,828.60	-	-	49,753.45	219,999.65	
CY 2010 FIRST QUARTER	\$ 5,104.40	\$ 37,457.15	\$ -	\$ -	\$ 12,438.36	\$ 54,999.91	\$ 55,000.00
CY 2010 SECOND QUARTER	\$ 5,104.40	\$ 37,457.15	\$ -	\$ -	\$ 12,438.36	\$ 54,999.91	\$ 55,000.00
CY 2010 THIRD QUARTER	\$ 5,104.40	\$ 37,457.15	\$ -	\$ -	\$ 12,438.36	\$ 54,999.91	\$ 55,000.00
CY 2010 FOURTH QUARTER	\$ 5,104.40	\$ 37,457.15	\$ -	\$ -	\$ 12,438.36	\$ 54,999.91	\$ 55,000.00

**ESTIMATED POST DECOMMISSIONING OVERSIGHT EXPENDITURES AND
BUDGETED TRANSFERS FROM ACCOUNT 014-10A-2440-03**

	DEP 014-06A-1790-14	DHHS Safety Inspector 01410A244003	OPA SNSA 01407H041004	PUS STATE POLICE 01416A029104	DHHS DEH RCP 014-10A-2445-03	TOTAL	INCOME
<u>CY 2011</u>							
DEP - Radiological Program	20,000					20,000	
OPA - Nuclear Safety Advisor						-	
OPA- All Other						-	
DHHS - RCP					3,267	3,267	
DHHS - Safety Inspector		135,000				135,000	
DHHS - Contractor and Independent Expert		5,000				5,000	
DPS -Body Armor repl. (5)				45,000		45,000	
Sub - total	20,000	140,000	-	45,000	3,267	208,267	
DICAP - DHHS \$5,000/FTE		5,000			850	5,850.00	
Sta - cap rates OPA	0.006391		-			-	
Sta - cap rates DEP - Envir. Prot.	0.02088	417.60				417.60	
Sta - cap rates DHHS - Bur Health	0.03449	4,828.60			112.68	4,941.28	
Sta - cap rates DEP - State Police	0.01163			523.35		523.35	
Total Est. Sta-cap Exp.	417.60	9,828.60	-	523.35	962.68	11,732.23	
TOTALS	20,417.60	149,828.60	-	45,523.35	4,229.68	219,999.23	
CY 2011 FIRST QUARTER	\$ 5,104.40	\$ 48,485.45			\$ 1,409.89	\$ 54,999.74	\$ 55,000.00
CY 2011 SECOND QUARTER	\$ 5,104.40	\$ 48,485.45	\$ -		\$ 1,409.89	\$ 54,999.74	\$ 55,000.00
CY 2011 THIRD QUARTER	\$ 5,104.40	\$ 4,372.25	\$ -	\$ 45,523.35	\$ -	\$ 55,000.00	\$ 55,000.00
CY 2011 FOURTH QUARTER	\$ 5,104.40	\$ 48,485.45	\$ -		\$ 1,409.89	\$ 54,999.74	\$ 55,000.00

NEW
ENGLAND
GOVERNORS'
CONFERENCE, INC.



December 16, 2009

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The Honorable Steven Chu
Secretary
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Secretary Chu:

We are writing regarding your announced intention to appoint a Blue Ribbon Commission to examine alternatives to the current federal program for managing and disposing of spent nuclear fuel and high-level radioactive waste. We hope this initiative will lead to the development of a sustainable, long-term policy that appropriately recognizes and balances national, regional, and state interests.

As you know, New England is home to three permanently shut down single unit reactor sites. At each of these sites, all decommissioning and site restoration activities have been completed in areas removed from the Nuclear Regulatory Commission license for each site. Spent nuclear fuel storage areas and activities remain licensed by the Nuclear Regulatory Commission. Accordingly, all three sites could be fully returned to the benefit of the local communities, but for the fact that the used nuclear fuel and high level radioactive waste has not been removed by the federal government as required by law and contract. In addition, the ratepayers of New England continue to pay tens of millions of dollars annually for the continued storage of such material at both decommissioned and operating nuclear reactor sites. We would further note that all of the nuclear waste material at these sites is stored in dual-purpose canisters that have been licensed by the Nuclear Regulatory Commission for transportation.

There is growing consensus that the expedited removal and consolidation of spent nuclear fuel and high-level waste from decommissioned reactor sites is sound public policy. The Department of Energy has heard this message from, among others: members of New England's Congressional delegation; the New England Council; the Maine Public Utilities Commission; the National Association of Regulatory Utility Commissioners; the National Conference of State Legislatures; the National Commission on Energy Policy; the American Physical Society; the National Research Council; and the Nuclear Waste Strategy Coalition.

We also request that you direct the Blue Ribbon Commission to develop policy alternatives and recommendations that will lead to the removal of the spent nuclear fuel and high level waste stored at decommissioned and operating reactor sites at the earliest possible date. As you know, the Nuclear Regulatory Commission generally licenses canisters for spent nuclear fuel storage for only 20 years. After this time the Nuclear Regulatory Commission must review the storage system and may only relicense canisters for additional 20 year periods. This uncertainty in the

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storage time for the canisters presents the potential for significant safety and environmental issues if a system fails to receive relicensing for decommissioned reactor sites that no longer have the ability to move spent nuclear fuel and high level waste between canisters.

We are pleased to learn that you recently stated your intention to appoint a Commission member with experience managing spent nuclear fuel at decommissioned reactor sites. It is crucial that this type of expertise be represented on the Commission.

Thank you for considering our views as you approach this most important task.

Sincerely,



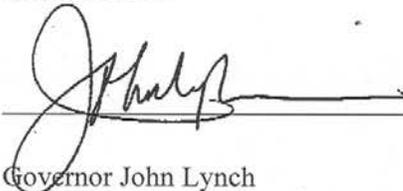
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Governor Deval L. Patrick, Vice Chair
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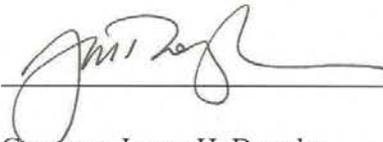
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NEW ENGLAND GOVERNORS' CONFERENCE, INC., Boston, Massachusetts 02110-1226

**STATEMENTS EMPHASIZING THE NEED TO ADDRESS THE SPENT FUEL
STORAGE ISSUE AT DECOMMISSIONED NUCLEAR POWER REACTORS
2007 - 2010**

“Yucca Haunts Admin's Lagging Efforts on Nuclear Waste Study Panel “ New York Times, 1/11/10

“There are also nine power plants that have been decommissioned but still have 2,800 metric tons of on-site used fuel, said Brian O'Connell, director of the nuclear waste program at the National Association of Regulatory Utility Commissioners.”

"The properties would otherwise be turned back for productive use but for the stranded nuclear waste," O'Connell said. "We subscribe to the belief that it is economic and safer to collect all that stuff in the nine locations and put them in a central site that is better designed, managed and operated for that purpose.

Nuclear Energy Overview (publication of the Nuclear Energy Institute) – “New England Governors to Chu: Shutdown Reactor Used Fuel Needs Removal” 12/22/09

“Marshall Cohen, NEI senior director for state and local government affairs, said, “We certainly respect the governors’ concerns regarding their used fuel, especially at the decommissioned plants. We hope these governors will get behind our efforts to develop interim storage at one or more sites in volunteer communities. Our proposal for an interim storage project has decommissioned fuel moving first, and clearly the New England states would likely be first of the first to move their fuel...”

Letter to DOE Secretary Chu from New England Governor’s Baldacci; Rell; Carcieri; Patrick; Lynch; and Douglas, December 18, 2009

“There is growing consensus that the expedited removal and consolidation of spent nuclear fuel and high-level waste from decommissioned reactor sites is sound public policy.” ... “We also request that you direct the Blue Ribbon Commission to develop policy alternatives and recommendations that will lead to the removal of the spent nuclear fuel and high level waste stored at decommissioned and operating reactor sites at the earliest possible date.” ... “We are pleased to learn that you recently stated your intention to appoint a Commission member with experience managing spent nuclear fuel at a decommissioned reactor sites. It is crucial that this type of expertise be represented on the Commission.”

“NUCLEAR WASTE MANAGEMENT: Key Attributes, Challenges, and Costs of the Yucca Mountain Repository and Two Potential Alternatives”, U.S. Government Accountability Office (GAO-10-48) November 2009

“Centralized storage at two locations provides an alternative that could be implemented within 10 to 30 years, allowing more time to consider final disposal options, nuclear waste to be removed from decommissioned reactor sites, and the government to take custody of commercial nuclear waste, saving billions of dollars in liabilities.” (Summary Sheet)

“Centralized storage would consolidate the nation’s nuclear waste after reactors are decommissioned, thereby decreasing the complexity of securing and overseeing the waste and increasing the efficiency of waste storage operations. This alternative would remove nuclear waste from all DOE sites and nine shutdown reactor sites that have no operations other than nuclear waste storage, allowing these sites to be closed. Some of these storage sites occupy land that potentially could be used for other purposes, imposing an opportunity cost on states and communities that no longer receive the benefits of electricity generation from the reactors.” (page 29)

Letter to DOE Secretary Chu from Jim Brett, New England Council President, October 13, 2009

“As you work to create the Commission, we respectfully recommend that the Administration include on any panel the expertise and experience of someone intimately familiar with the challenges and day-to-day management of decommissioned plants, especially the three sites located in New England. We are heartened at your August 4 reply to the Massachusetts Senate delegation stating that you are in agreement with the suggestion that “such an expert” should be included on the panel.”

“We hope in the short-term the Administration recognizes the challenges faced by the decommissioned nuclear plant sites in New England that are serving as de facto interim nuclear waste storage facilities and that the Blue Ribbon Commission is instructed to specifically develop recommendations for timely removal of the radioactive material stranded at these sites.”

Ernest Moniz (principal author of the forthcoming MIT report “The Future of the Nuclear Fuel Cycle”) - Remarks before the Nuclear Waste Technical Review Board, Nuclear Energy Overview, Sept 25 – Oct 1, 2009

“The NWTRB heard of progress on the Massachusetts Institute of Technology’s report, “The Future of the Nuclear Fuel Cycle,” to be published this fall.” ... “Several speakers noted the current success of the nuclear industry in the safe and secure storage of used nuclear fuel at reactor sites, including Moniz, who added that consolidating storage to centralized locations made sense for shutdown and decommissioned nuclear reactors.”

Letter to the Chairman and Ranking Member of the Senate Subcommittee on Energy and Water Development from Senators Lieberman and Dodd, September 14, 2009

“As you finalize the Energy and Water Appropriations Act of 2010, we urge that any language pertaining to the proposed Blue Ribbon Commission on nuclear waste remain mindful of the special circumstances confronting decommissioned nuclear reactor sites. We think it is essential that national nuclear waste policy consider the storage issues surrounding their unique situation.”

“A number of independent reviews of our nation’s civilian nuclear energy and disposal programs have consistently recognized that the removal of the nuclear waste material from decommissioned reactor sites needs urgent attention. We believe that the Commission should

recognize that permanently shutdown single-unit reactor sites, such as the Connecticut Yankee facility in our state, face a unique set of circumstances with regard to waste management and acknowledge that these sites merit distinct treatment for that reason.”

DOE Secretary Chu response to the Senator Kennedy/Kerry letter, August 4, 2009

“Thank you for your July 10, 2009, letter requesting that the “blue-ribbon” panel that the Administration intends to convene consider strategies for disposing of spent nuclear fuel at permanently shut-down, single unit plants like Yankee Rowe, and that we include a member with expertise in spent-fuel management at decommissioned plants. I agree with your suggestion for such an expert to be included on the panel.”

HR 3183 - 2010 House Energy and Water Development Appropriations Bill Report 111-203, Nuclear Waste Disposal Section, (page 118)

“Therefore, the Committee makes the \$5,000,000 available for the Blue Ribbon Commission only for an analysis of alternatives that includes all options for nuclear waste disposal based on scientific merit, as previously discussed in the Management of Nuclear Spent Fuel and Radioactive Waste section of this report.” “Additionally, the Committee directs that the proposed Blue Ribbon Commission shall include an appropriate level of representation of decommissioned reactor sites to ensure their interests are considered in the formulation of a national nuclear waste policy.”

Letter to DOE Secretary Chu from Senators Kennedy and Kerry, July 10, 2009

“We’re writing to respectfully request that the forthcoming Blue Ribbon Commission on spent nuclear fuel recommend alternative strategies to Yucca Mountain for managing the nation’s civilian spent nuclear fuel at permanently shut-down, single-unit nuclear plants, including the Yankee Rowe facility in Massachusetts. ... The Commission should recognize that there are special circumstances at the sites of permanently shut down reactors and that consolidating this material for long-term management merits priority attention. ... Selecting a Commissioner with special expertise on these sites will enable the panel to address the longstanding and unique challenges posed by spent fuel storage at these sites.”

Letter to DOE Secretary Chu from the Maine PUC, MARUC, MWSC, Pennsylvania PUC, Prairie Island Indian Community, New England Council, June 17, 2009

“While the NRC is currently reviewing the DOE’s license application for the Yucca Mountain project, the Commission should encourage the DOE to implement the pilot projects proposed in its National Transportation Plan. These pilot projects will demonstrate that transporting Greater-Than-Class-C waste, spent nuclear fuel and high-level radioactive waste to a central interim storage facility or regional facilities would be safe and a cost-effective option for managing the material from commercial, decommissioned power plants and federal facilities.”

Letter to DOE Secretary Chu from the National Conference of State Legislatures, May 4, 2009

“As long term solutions are developed, we believe that the country can move forward with interim storage facilities.” ...“Finally we believe that used fuel sitting at decommissioned or shut down nuclear reactor sites in Maine, Connecticut, Wisconsin, Oregon, Michigan, Colorado, Illinois, California and Massachusetts should be the first material transported to these facilities, enabling those states to complete the clean up process at their reactor sites.”

NWSC Comments on the DOE National Transportation Plan, April 30, 2009

“While the NRC is currently reviewing the DOE’s license application for the Yucca Mountain project; adequate funds are available in the NWF for DOE to implement its transportation systems plan. The DOE/OCRWM proposed in the National Transportation Plan to, “... conduct pilot projects to assess the adequacy of policies, procedures, and processes that are unique to DOE transportation system.... These pilot projects will demonstrate that transporting Greater-Than-Class-C waste, spent nuclear fuel and high-level radioactive waste to a centralized interim storage facility would be safe and a cost-effective option for managing the material from decommissioned power plants and other facilities.”

Letter to President Barrack Obama from U.S. Congressmen (Courtney, Olver, Kind, Stupak, Pingree, Michaud, Lundgren) , March 24, 2009

“To this end, as you and members of your administration review our nation’s plans to manage civilian spent fuel and high-level waste, we ask that you give priority attention to the removal of this material from these sites (*shutdown reactor sites*). Specifically, we believe that these facilities merit distinct treatment in spent fuel management programs and that they collectively be given a full voice in the review of our nation’s spent fuel program.” ...

“You have made clear that the Congress and the Administration must seriously examine the next steps in our nation’s spent fuel management program. As you conduct such an examination, we firmly believe that our sites should have a separate and distinct role, or, a “seat at the table,” in such a process. These deliberations must ensure that the government demonstrates its ability to fulfill its spent fuel management responsibilities by developing a serious plan to take title to, and soon remove, spent fuel from these sites.”

National Journal – Energy & Environment Blog “How Should America Handle Its Commercial Nuclear Waste?” 2/23/2009 - Response by Marvin Fertel, President and CEO, Nuclear Energy Institute

“Consolidating used fuel at private or government centralized storage facilities is necessary for the federal government to begin meeting its legal commitment. Initially, centralized facilities should provide storage for reactor fuel from power plants that have been shut down.”

NARUC Comment Letter to U.S. NRC's Waste Confidence Proposed Rulemaking, Feb 3, 2009

“However, NARUC remains very concerned about the Department of Energy failure to fulfill its obligations under the NWPA and in the standard contracts with reactor owners (licensees) to accept the spent fuel for removal from present reactor storage sites, especially for locations where the reactors have shutdown and little remains besides the spent fuel and personnel and infrastructure to manage and protect the fuel.”

Letter to President-Elect Barrack Obama from Five U.S. Senators, January 15, 2009

“As you consider alternatives for storage of spent nuclear fuel and associated waste, we urge you to give priority to the issue of waste at shut-down reactors. A number of recent reviews of our nation’s civilian nuclear energy program have recognized that, because there is no operational activity at these reactors, there is a need to recognize that disposal of spent fuel and associated waste from these facilities needs particular, priority attention.”

Nuclear Waste Strategy Coalition - Comment Letter to the U.S. NRC regarding their Proposed Revision to the Waste Confidence Rule, December 4, 2008

“... moving spent nuclear fuel and high-level radioactive waste to a centralized interim storage facility would be safe and a cost-effective option for managing spent nuclear fuel and high-level radioactive waste from decommissioned power plants and other facilities and should be authorized and funded for the near-term while a geologic repository is being licensed by the NRC.”

Testimony of Kevin D. Crowley, Ph.D. Senior Board Director, Nuclear and Radiation Studies Board, National Research Council, Before the Senate Committee on Commerce, Science, and Transportation Regarding the Safety and Security of Spent Nuclear Fuel Transportation, September 24, 2008 – page 10

“Within the context of its current contracts with commercial spent fuel owners, DOE should initiate transport to the federal repository through a pilot program involving relatively short, logistically simple movements of older fuel from closed reactors to demonstrate its ability to carry out its responsibilities in a safe and operationally effective manner.”

Letter on Nuclear Waste from Jim Brett, President of the New England Council, Inc to the New England Senate and House Delegation Members, July 23, 2008

“As you also know, New England is home to three shutdown commercial reactors in Massachusetts, Maine, and Connecticut. Until the early-mid 1990’s, these three sites provided New England residents with safe, reliable, and affordable power, and are now storing the spent material (and incurring the costs) the federal government had agreed to take possession of by 1998. In the case of the New England plants, because they are now fully decommissioned, the costs being incurred are entirely related to the secure storage

of the spent fuel.” ... “We were pleased to see Congress include language in the Fiscal Year 2008 omnibus appropriations bill that directs the U.S. Department of Energy to develop a meaningful plan to remove spent nuclear fuel stored at decommissioned reactor sites and provide for the consolidated storage.”

Senate 2315: “Strengthening Management of Advanced Recycling Technologies Act of 2008” introduced June 26, 2008

SEC. 6. ACCEPTANCE, STORAGE, AND SETTLEMENT OF CLAIMS.

(d) Priority for Acceptance for Closed Facilities- If a request for fuel acceptance is made under paragraph (2) by a facility that has produced used nuclear fuel and that is shut down permanently and the facility has been decommissioned, the Secretary shall provide priority for the acceptance of the fuel produced by the facility.

National Conference of State Legislatures – Policy Statement April 26, 2008

“The National Conference of State Legislatures adopted new policy language on April 26th NCSL urges Congress and the administration/DOE to:

- “Pursue the development of one or two private Nuclear Regulatory Commission-licensed, interim storage facilities to which spent/used nuclear fuel can be safely shipped and stored until such time as a permanent repository is open and commercial nuclear fuel recycling facilities are available.”
- “Determine the Department of Energy’s role and responsibilities under the Nuclear Waste Policy Act in moving spent/used nuclear fuel, including fuel from decommissioned plant sites, to interim storage facilities.”

Nuclear Energy Institute – Interim Storage of Used Fuel Presentation (February 2008)

“Key Elements for Interim Storage” (slide 11 – bullet #6)

- “Move Decommissioned Plant Fuel First”

Nuclear Waste Strategy Coalition – Mission and Goals (February 2008)

“The Federal government must initiate removal of spent nuclear fuel and high-level radioactive waste currently stranded at more than 72 commercial and decommissioned nuclear electric power plants across the nation. Timely waste removal encompasses:

INTERIM STORAGE. Centralized interim storage facilities are a safe and cost-effective option for managing spent nuclear fuel and high-level radioactive waste from decommissioned power plants and other facilities and should be authorized and funded for the near-term while a permanent facility is being licensed and constructed.”

Nuclear Waste Strategy Coalition – Nuclear Waste Disposal Program - Next Steps
(February 2008)

“Centralized Interim Facilities. The NWSC generally supports the recommendation in the FY 2008 Consolidated Omnibus Appropriations Act directing the DOE to develop a plan to take custody of spent fuel currently stored at decommissioned reactor sites for consolidation at an existing federal site, operating reactor site(s), or sites that volunteered to host GNEP facilities. In addition, DOE should also address the need for interim storage and disposal of greater-than-class-C waste.”

NARUC "Resolution Regarding Guiding Principles for Disposal of High Level Waste"
(February 2008)

“Continued storage of spent nuclear fuel at permanently shut down plants is unacceptable because it imposes additional costs on ratepayers responsible for paying the costs associated with such on-site storage without offsetting benefits and prevents economic reuse of the site, while transfer of spent nuclear fuel from such sites to appropriate, centralized interim storage would likely reduce the government’s liability for failure to begin waste acceptance in a timely manner and improve public safety.”

The FY-08 Consolidated Omnibus Bill Report (HR 2764 –PL 110-161)

NUCLEAR WASTE DISPOSAL

“The Department is directed to develop a plan to take custody of spent fuel currently stored at decommissioned reactor sites to both reduce costs that are ultimately borne by the taxpayer and demonstrate that DOE can move forward in the near-term with at least some element of nuclear waste policy. The Department should consider consolidation of the spent fuel from decommissioned reactors either at an existing federal site, at one or more existing operating reactor sites, or at a competitively-selected interim storage site. The Department should engage the sites that volunteered to host Global Nuclear Energy Partnership facilities as part of this competitive process.”

The New England Council: Washington Report (June 26, 2007)

“The House Appropriations Committee approved the Subcommittee on Energy and Water’s FY 2008 funding level recommendation, which contained a provision that would provide \$494.5 million for the Department of Energy’s (DOE) waste management program. The Committee report directs the DOE to “... develop a plan to take custody of spent fuel currently stored at decommissioned reactor sites,” including those in New England. The Committee went on to instruct the DOE to consolidate the spent fuel. The Council has consistently supported such consolidation, and we will work to ensure that this provision remains in the final appropriations bill.”

House Appropriations Committee Report 110-185: Energy & Water Development Bill H.R. 2641 – Nuclear Waste Disposal Section (June 2007)

"The Committee directs the DOE to develop a plan to take custody of spent fuel currently stored at decommissioned reactor sites to both reduce costs that are ultimately borne by the taxpayer and demonstrate that DOE can move forward in the near-term with at least some element of nuclear waste policy. The Department should consider consolidation of the spent fuel from decommissioned reactors either at an existing DOE site, at one or more existing operating reactor sites, or at a competitively-selected interim storage site. The Department should engage the 11 sites that volunteered to host GNEP facilities as part of this competitive process."

The Keystone Center, "Nuclear Power Joint Fact-Finding Report" (June 2007)

"Centralized interim storage is a reasonable alternative for managing waste from decommissioned plant sites." (Report Press Release)

"A centralized facility that took all the spent fuel from decommissioned reactors would reduce the number of spent fuel installations, provide for consolidated and more efficient oversight of the waste, and allow the decommissioned sites to be reclaimed for other purposes. Furthermore, centralizing the management of the waste would relieve plant owners of the ongoing liability for facilities that no longer generate revenue and would provide a framework for DOE's assumption of direct responsibility for management of spent fuel." ... For example, if waste must be repackaged before it can be placed in Yucca Mountain, a centralized facility could provide consolidated fuel handling, eliminating the need at each shut-down reactor. Further, if the final Yucca Mountain design requires a buffer storage area so that a mix of wastes can be used to meet heat load requirements, this could also be done at a centralized facility". (Page 79).

National Commission on Energy Policy, "Energy Policy Recommendations to the President and the 110th Congress" Section 6. Nuclear Energy (April 2007)

"Take action to address the current impasse on nuclear waste disposal, while reaffirming the ultimate objective of siting and developing one or more secure geologic disposal facilities, by amending the Nuclear Waste Policy act (NWPA) to: ... Require the Secretary of Energy to take possession of and/or remove fuel from reactor sites that have been, or are in the process of being fully decommissioned." (Page 7)

American Physical Society, Panel on Public Affairs, "Consolidated Interim Storage of Commercial Spent Nuclear Fuel: A Technical and Programmatic Assessment" – (February 2007)

"We focus on the issues associated with proposals to establish one or more sites for the consolidated storage of spent nuclear power reactor fuel as an interim measure before final disposition." ... Consolidated storage could facilitate the decommissioning of sites with reactors that have been shut down." (Executive Summary)

“If consolidated interim storage becomes available and should repackaging of existing dry casks become necessary then existing casks could, in principle, be repackaged at the consolidated sites instead of at the reactor sites. There are advantages to repackaging away from the reactor sites. First there are no facilities at decommissioned sites for opening and transferring spent fuel from existing casks. A consolidated site can offer consolidated, efficient fuel handling, eliminating the need for a facility at each closed site.” (Page 14)