

## **Riverkeeper Comments on NRC Task Force recommendations for prioritizing course of action post – Fukushima**

### **Testimony from Phillip Musegaas, Hudson River Program Director**

As a preliminary matter, Riverkeeper disagrees with the Staff's conclusions as to whether the Task Force's findings "identified an imminent hazard to public health and safety." We support the actions of NRDC and other citizens' groups to require the NRC to begin implementing the Task Force's recommendations immediately, in order to address urgent safety and preparedness concerns at operating nuclear plants. Riverkeeper has filed a legal challenge in the Indian Point relicensing proceeding to suspend the proceeding pending the implementation of these recs, and to require a full assessment of the risks and impacts of Indian Point's operation in the relicensing review.

For today's meeting, however, my comments are focused on the staff's specific recommendations in SECY -11-0137. Riverkeeper fully supports NRDC's earlier comments regarding NRC's recommendations related to reevaluating seismic and flooding risks at nuclear plants, strengthening plants' ability to cope with station blackouts (SBOs), and determining whether spent fuel pools are able to handle natural phenomenon. We also support the staff's recommendation that NRC address certain emergency preparedness concerns as Tier 1, i.e. priority issues; however, Riverkeeper disagrees with NRC that other recommendations related to critical emergency preparedness (EP) issues, in particular, EP enhancements to address SBO and multi-unit events, are less of a priority; to the contrary, these recommendations should be implemented immediately.

More importantly, the Commission should approve the staff's Additional Recommendations regarding;

- The transfer of spent fuel from spent fuel pools to dry cask storage, and
- The basis for the 10 mile Emergency Planning Zone (EPZ)

Riverkeeper strongly urges the Commission to immediately address the issue of spent fuel storage – the risks of high density storage in aging pools is well documented, and was further highlighted at Fukushima Daichi.

Transferring spent fuel from overfilled pools to hardened dry cask storage would lower this risk significantly, if not entirely, yet the Commission has thus far refused to consider it. Why? The Commission has not provided an adequate answer, and in its absence, the public can only assume that the nuclear industry has complained of the economic cost, and the NRC has capitulated.

The need to reexamine the basis for the 10 mile Emergency Planning Zone is at least as critical an issue as nuclear waste storage, and requires the same expedited response from the Commission. Riverkeeper's position on the feasibility of a 10 mile EPZ for Indian Point is clear – it will not protect the public living near Indian Point from exposure to radiation in the event of a

radiological release, because it will be impossible to evacuate people in time from the surrounding area. 20 million people live and work within 50 miles of IP, and the prevailing winds in the Hudson Valley blow from the north, towards Manhattan. The mounting evidence of widespread contamination from the Fukushima Daichi meltdowns in Japan should be a wake-up call to the Commission to address this issue immediately.

Riverkeeper will continue to press for resolution of these issues with the Commission, our federal and state elected officials, and in federal court if necessary until they are resolved, and the public regains its confidence in the NRC to put public health and safety first.