



OFFICE OF THE GOVERNOR
AGENCY FOR NUCLEAR PROJECTS

1761 E. College Parkway, Suite 118

Carson City, Nevada 89706

Telephone: (775) 687-3744 • Fax: (775) 687-5277

E-mail: nwpo@nuc.state.nv.us

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Michael T. Lesar, Chief
Rulemaking and Directives Branch (RDB)
Office of Administration, Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Topics for Discussion at a Spent Fuel Storage and Transportation Licensing
Conference on June 23 – 24, 2010

Dear Mr. Lesar:

In response to NRC's March 2, 2010 Federal Register Notice, I am providing the following topics that the State of Nevada believes are important in the context of spent nuclear fuel storage and transportation licensing:

1. Current Spent Fuel Inventory in the United States, and Percentage of Spent Fuel in Dry Storage
2. Projected Spent Fuel Inventories in the United States, for Various Nuclear Power Growth Scenarios
3. Past and Present Spent Fuel Shipments in the US (The most recent revision of NUREG-0725, rev. 14, September 2006, provides data for 1979-2005.)
4. Projected Spent Fuel and High-level Radioactive Waste Shipments to Repositories, Regional Storage Facilities, and Reprocessing Facilities (Recent NEPA documents estimating future shipments include the DOE FEIS and SEIS for Yucca Mountain, and the DOE DEIS for GNEP)
5. NRC Staff Experience with the DOE Yucca Mountain TAD Canister Proposal, and Lessons Learned for Future Efforts to Integrate Storage, Transport, and Disposal Licensing
6. Current Status of the Commission's Waste Confidence Decision
7. Current Status of the NRC Staff Review of the Paradigm for Spent Fuel Storage and Transportation Regulatory Programs For Extended Periods Beyond the 120 Year Timeframe (COMDEK-09-0001) and Plans for Stakeholder Involvement

8. Technical Performance Criteria for Licensing Storage and Transportation Systems Designed to Operate Beyond 120 Years
9. Institutional Issues for Storage and Transportation Beyond 120 Years
10. Implications of Reprocessing and MOX Fuel for Storage and Transportation
11. Implications of Nuclear Industry Globalization for Storage and Transportation Regulation in the US
12. NRC Transportation Security and Safety Studies, 1977 – 2009, Ongoing Studies, and Plans for Future Studies
13. NRC Response to NAS Transportation Study “Going the Distance?” (2006)
14. Historical Data on Transportation Accidents and Incidents
15. Historical Data on Human Errors in Transportation System Design, Fabrication, and Operation, and NRC Enforcement Actions
16. Consequences of Severe Transportation Accidents
17. Spent Fuel Burn-up and Cooling Time as Transportation Risk Factors
18. Full-scale Testing of Shipping Casks (including current status of NRC Package Performance Study recommendations)
19. NRC Position on Transportation-Related NEPA Issues regarding Licensing of Storage, Disposal, and Reprocessing Facilities
20. NRC Position on USDOT/DHS Rules Regarding Rail Shipments of SNF through Highly Populated Areas (HPAs) and High Threat Urban Areas (HTUAs)
21. Native American Concerns regarding Storage and Transportation
22. NRC Position on State and Indian Tribe Role in Transportation Inspections, Escorts, Enforcement
23. NRC Position on Funding for Emergency Preparedness Planning and Training
24. Human Factors Management in Design of Storage and Transportation Systems
25. Consequences of Transportation Terrorism and Sabotage
26. NRC plans to Address Transportation Terrorism and Sabotage Concerns (NRC Proposed Rulemaking regarding 10 CFR 73)

Please note that the above-referenced topics have not been ordered to reflect priorities or relative importance. However, issues involving states’ roles and responsibilities; shipment safety, safeguards, and sabotage/terrorism are of heightened concern to Nevada and, I suspect, to other states as well.

Thank you for the opportunity to provide input into the upcoming storage and transportation licensing conference. We look forward to an interesting and productive discussion.

Sincerely,



Bruce Breslow
Executive Director