From: Dirk Dunning, retired professional engineer.

I write today in opposition to House Bills 2410.

The legislature should reject these proposals as creating unwarranted risks to the citizens of Oregon, a violation of the trust of the citizens of Oregon and faith in the policy choice the citizens made via Initiative.

Nuclear fission has no place in the energy makeup of our future.

I have a unique perspective on the proposed actions. I am a retired Registered Professional Engineer, and formerly licensed Nuclear Power Engineer. For the last 25 years of my career, I worked at the Oregon Department of Energy as senior staff doing technical analysis and policy review of nuclear matters and in the cleanup of the nuclear mess at the Hanford Nuclear Reservation in eastern Washington State, as well as for Nuclear Safety and Energy Emergency Response for the State of Oregon. I was on call 24/7 throughout my entire career in that role, principally concerned with the Columbia Generating Station and every conceivable nuclear accident at Hanford or the Columbia Generating Station.

I want to highlight several areas of particular concern with the current bills.

1. **Existing Oregon Law Reflects Sound Judgment**
    - Oregon's 1970s law requiring both an operating waste repository and voter approval was not arbitrary.
    - It recognized fundamental safety and democratic principles.
    - These requirements remain valid safeguards, especially given ongoing waste management challenges.
2. **Democratic Processes**
    - Oregon citizens established these protections through democratic processes.
    - Any change must require State-wide (not County based) voter approval.
    - Doing otherwise subverts public trust.
3. **Alternative Technologies**
    - The approaching viability of nuclear fusion, such as systems from Helion, Commonwealth Fusion Systems, and TAE Technologies creates a "valley of death" for SMRs. SMRs are:
        - Too late to fight climate change.
        - Too late to avoid competitive disruption from fusion.
        - Hugely burdened by security costs.
        - Highly vulnerable to rapidly changing energy markets

4. **Waste Repository Reality**
    - Current on-site storage methods never were permanent solutions.
    - After 50+ years and billions spent, the U.S. still has no operating high-level waste repository.
    - Proposing new reactors before solving waste disposal is irresponsible.
    - Seeking to bypass repository requirements and voter approval create dangerous precedents.
    - Strong regulatory frameworks protect both public safety and industry itself.
    - The State cannot dictate to the Federal Government when they will take the wastes created.
5. **Security Vulnerabilities**
    - SMRs require radioactive fuel storage and have vulnerable cooling systems. As the Waste Encapsulation Storage Facility at Hanford clearly shows, the designs of current storage pools are extremely dangerous and unacceptable.
    - New forms of drone warfare and swarm attacks create extreme added security and safety risks requiring all facilities be hardened against any attack now or in the 60-plus year life of the facilities.
6. **Economic Reality Check**
    - SMRs cannot obtain full private insurance in commercial markets and require Price-Anderson government backstops
    - These impose cost and risks on the public with no public benefit.
    - Long construction timeframes and high capital costs will create stranded assets.
    - No special economic advantage should be provided for any fission reactor system.

Nuclear fission was a field with promise 80 years ago. That time and that promise is now gone.