

7 CHRIS BINZER: Chris Binzer with the Nuclear
8 Energy Institute. [Yucca Mountain is vitally I
9 important to the national interest and is a key
10 element of an integrated approach to the safe
11 management of used nuclear fuel. Yucca Mountain
12 supports the nation's best large scale option to meet
13 growing energy demand without releasing harmful
14 pollutants or climate change.

15 The design changes and updated analytical
16 methods reflected in the Yucca Mountain SEIS
17 represent substantial improvements, enhancing what
18 was already a strong safety case to provide even
19 greater confidence in the safety of Yucca Mountain.

20 Surface facilities have been greatly
21 simplified, reducing the amount of used fuel that has
22 to be handled at the repository.

23 Industry has actively participated in the
24 development of the multipurpose transportation, aging
25 and disposal canisters that make this simplification
possible and supports their use.

2 Additional scientific advances have been
3 applied to the evaluation of the ability of the
4 repository to protect public health and safety for up
5 to a million years.

6 This SEIS shows that annual radiation
7 exposures to future populations will always be
8 extremely small, comparable to what an individual
9 receives in a single cross-country plane flight

10 today.

11 Industry believes, based on an independent
12 analysis by the EPRI institute, that there still
13 exists the substantial conservatism in DOE's
14 analysis. In other words, the repository may perform
15 even better than even these latest results indicate.

16 DOE should continue to refine its analysis
17 as future scientific advances are made. Yucca
18 Mountain is an extremely long term project, and we
19 should always apply the best our technology has to
20 offer to assure its safety.

21 The information in this SEIS appears to
22 provide a strong indication that DOE has completed
23 sufficient design and analytical work to enable the
24 completion of a thorough and high quality application
25 to the Nuclear Regulatory Commission for licenses to

1 build and operate the repository.

2 Industry intends to offer specific comments
3 on the details of this information in writing prior
4 to the January 10th, 2008 deadline, however, our
5 review to date finds this EIS to be, overall, a well
6 prepared document.

7 The NRC licensing process will significantly
8 test DOE's work and the public will have ample
9 opportunity to challenge its every conclusion. It is
10 time to get on with the license process and let an
11 objective review of the science for once and for all
12 decide the fate of Yucca Mountain.

13 There's considerable experience with the

14 transportation of used nuclear fuel over the past
15 four decades that demonstrate the safety. Over 3,000
16 shipments in the U.S., 78 percent by truck and
17 22 percent by rail, transported over 1.7 million
18 miles, over 24,000 shipments internationally with
19 more than 73,000 metric tons of used nuclear fuel
20 safely transported.

21 The robust design of shipping containers for
22 used nuclear fuel assures that this record will
23 always be maintained.

24 Used nuclear fuel is transported in
25 vault-like highly engineered containers. Multiple
1 barriers provide defense-in-depth protection. Rail
2 containers weigh between 75 and 125 tons. Containers
3 are required to withstand a 30 foot fall onto an
4 unyielding surface, a 40 foot fall into a six-inch
5 spike, 30 minutes in a fully engulfing fire at
6 1,475 degrees Fahrenheit and the submergence under
7 50 feet of water.

8 Extensive engineering analysis and
9 full-scale testing confirm the capability of these
10 robust container designs to withstand these extreme
11 events.

12 These containers have also been placed on
13 trains and trucks tied to rocket sleds and crashed at
14 high speeds, maintaining their integrity and
15 demonstrating their capability to withstand even the
16 most severe accident.

17 All containers must be certified by the
18 Nuclear Regulatory Commission. Certification
19 requires that exacting engineering and safety
20 criteria be met.

21 The fact that these EISs show the impacts of
22 Nevada transportation to be small is consistent with
23 industry experience.]

2 24 [Industry believes that the use of rail, with
25 dedicated trains, is the best and most efficient

1 method to ship used nuclear fuel to Yucca Mountain

2 and, therefore, we support the construction of this
3 railroad.

4 Building a railroad to Yucca Mountain also
5 provides economic opportunity for communities in
6 rural Nevada. We applaud DOE's decision to open up
7 the railroad for shared use.

8 DOE should begin construction of this
9 railroad as soon as possible to facilitate the timely
10 opening of the Yucca Mountain repository.]