

14 CHRIS BINZER: Chris Binzer with the Nuclear
15 Energy Institute. [Yucca Mountain is vitally important to
16 the national interest and is a key element of an integrated
17 approach to the safe management of used nuclear fuel
18 (consisting of safe at-reactor storage, centralized interim
19 storage, development of recycling technologies, and
20 ultimate disposal of waste byproducts.)

21 Yucca Mountain supports the nation's best
22 large-scale option to meet growing energy demand without
23 releasing harmful pollutants or contributing to climate
24 change. The design changes and updated analytical
25 methods reflected in the Yucca Mountain Supplemental
1 Environmental Impact Statement represents substantial
2 improvements, enhancing what was an already strong
3 safety case to provide even greater confidence in the
4 safety of Yucca Mountain.

5 Surface facilities have been greatly
6 simplified, reducing the amount of used fuel that has to
7 be handled at the repository. Industry has actively
8 participated in the development of the Multipurpose
9 Transportation, Aging, and Disposal canisters that make
10 this simplification possible and supports their use.

11 Additional scientific advances have been
12 applied to the evaluation of the ability of the
13 repository to protect public health and safety for up to
14 a million years. This SEIS shows that annual radiation
15 exposures to future populations will always be extremely
16 small, comparable to what an individual receives in a

17 single cross-country plane flight today.

18 Industry believes based on independent
19 analysis by the EPRI Institute that there still exists
20 substantial conservatism in DOE's analysis. In other
21 words, the repository may perform even better than even
22 these latest results indicate. DOE should continue to
23 refine its analysis as future scientific advances are
24 made. For example, recycled waste forms available in
25 the future may be able to further improve safety.

1 Yucca Mountain is an extremely long-term
2 project, and we should always apply the best our
3 technology has to offer to assure its safety. The
4 information in this SEIS appears to provide a strong
5 indication that DOE has completed sufficient design and
6 analytical work to enable the completion of a thorough
7 and high quality application to the Nuclear Regulatory
8 Commission for licenses to build and operate the
9 repository.

10 Industry intends to offer specific comments on
11 the details of this information in writing prior to the
12 January 10, 2008, deadline. However, our review to date
13 finds this EIS to be overall a well-prepared document.

14 The NRC licensing process will significantly
15 test DOE's work, and the public will have ample
16 opportunity to challenge its every conclusion. It is
17 time to get on with the licensing process and let an
18 objective review of the science once and for all decide
19 the fate of Yucca Mountain.

20 There is considerable experience with the

21 transportation of used nuclear fuel over the past four
22 decades that demonstrates its safety: Over 3,000
23 shipments in the U.S., 78 percent by truck and 22
24 percent by rail; transported over 1.7 million miles;
25 over 24,000 shipments internationally; more than 73,000
1 metric tons of used nuclear fuel safely transported.

2 The robust design of shipping containers for
3 used nuclear fuel assures that this record will always
4 be maintained. Used nuclear fuel is transported in
5 vault-like highly engineered containers. Multiple
6 barriers provide defense-in-depth protection.

7 Rail containers weigh between 75 and 125 tons
8 to protect less than 20 tons of used nuclear fuel.
9 Containers are required to withstand a 30-foot fall onto
10 an unyielding surface, the equivalent of a 120
11 mile-per-hour train wreck; a 40-foot fall onto a
12 six-inch spike; 30 minutes in a fully engulfing fire at
13 1,475 degrees Fahrenheit; and submergence under 50 feet
14 of water.

15 Extensive engineering analysis and full scale
16 testing confirm the capability of these robust container
17 designs to withstand these extreme events. These
18 containers have also been placed on trains and trucks
19 tied to rocket sleds and crashed at high speeds,
20 maintaining their integrity and demonstrating their
21 capability to withstand even the most severe accidents.

22 All containers must be certified by the
23 Nuclear Regulatory Commission. Certification requires

24 that exacting engineering and safety criteria be met.
25 The fact that these Environmental Impact Statements show
1 the impacts of Nevada transportation to be small is
2 consistent with industry experience.]

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3 [Industry believes that the use of rail, with
4 dedicated trains, is the best and most efficient method
5 to ship used nuclear fuel to Yucca Mountain and,
6 therefore, we support the construction of this railroad.

7 Building a railroad to Yucca Mountain also
8 provides economic opportunity for communities in rural
9 Nevada. We applaud DOE's decision to open up the
10 railroad for shared use. DOE should begin construction
11 of this railroad as soon as possible to facilitate the
12 timely opening of the Yucca Mountain repository.]