MS. BINETTE: Hi, my name is Aja Binette. I'm the economics campaigner with Nuclear Information and Resource Services. NIRS appreciates that the DOE recognizes that since the Yucca Mountain plan is changing, it is necessary to reopen a process under the National Environmental Policy Act, and therefore engage with the public. Thank you for this opportunity to comment.

NIRS has members in all fifty states and we'll be alerting our membership as well as the public of this opportunity to comment on the totality of a plan that has the potential to impact so many people, because it will impact highly radioactive waste handling and storage at seventy-two sites around the country, potentially impact tens of millions of people living in communities, the transportation of highly radioactive waste would become a common place event, result in unlimited taxpayer inter-generational impacts, this program offers justification for the

continued production of more highly radioactive waste.

Unfortunately, Yucca Mountain is a study in undermining democracy. It is not a solution to highly radioactive waste. NIRS respectfully submits, once again -- NIRS first did so in 1998 -- that Yucca Mountain will not meet the stated goal of providing isolation of highly radioactive waste from the environment. Had the guidelines for the suitability of a repository mandated in law been applied, the site would have been disqualified.

It is not too late. The physical reality of the site has not changed. The compressed ash that passes for rock is still fractured. The water still travels through formation in less than fifty years, let alone a thousand. There is no waste on the ground at Yucca Mountain today, nor should there ever be. Why? Because of the potential for geological eruption from the hot spot known to be below the site.

Witness the earthquake fault lines, the near constant quaking of the site, a team of scientists studying crystal expansion with GPS satellite technology supported this evidence more than ten years ago. A major change in the plans for proceeding with the dump at Yucca Mountain is the inclusion of a fuel pool to dump canister, previously called a multi-purpose canister. The TAD is an effort to streamline the waste handling process at the dump.

However, it does so at the expense of the reactor communities and transportation corridor communities. While decreasing the number of shipments does reduce the risk of accidents, the overall handling of the package is more challenging, and the consequences of mishaps greater. The stated goal, not having to handle the irradiated fuel more than once, may also be misplaced. Increasing evidence indicates that the durability of fuel rod integrity may be far shorter than imagined.

DOE projections assume that piles of fuel pellets at the bottom of a container is an event in the distant future.

If that proves not to be the case, handlers seeking to intervene may be hindered by containers that are welded shut. Lessons learned on welded containers in Michigan include the inclusion of shims that have proven very difficult to reverse. The SEIS needs to include an assessment of the impacts on reactor site waste handling, reactor site waste storage, the pros and cons of welded versus bolted lids on the containers, including the history of extreme difficulty in reopening the containers and the impact of the larger container size, and therefore heavier haul and road transport.

Since there is no assurance that rail would be used exclusively, particularly since there is no rail access to Yucca, the prevalence of heavy haul nuclear shipments on the roads today suggest that over time, such

could occur with TADs. The SEIS also needs to consider the risk associated with a second round of waste handling at reactor sites currently using dry casks, since it is not likely that they will qualify if a uniform TAD design is required.

The SEIS should specify what the policy would be, and if reloading would be mandated, then on a case by case basis, consider every unique reactor site and existing cast design. Part of the evaluation should be the projected state of the fuel pool at the time such handling would occur. Cask loading constitutes a high risk activity in relation to fuel pool integrity. Incidents have already come close to accidents that could have resulted in fuel pool drain down at reactor sites in Michigan and Minnesota.

At this time, the DOE offers no meaningful alternative to the proposed TADs canister system. Thanks.

MR. BROWN: Thanks very much.

Okay, Kevin is next, and then Nithin Akuthota, and then Ian Zabarte.