

1 MR. KAMPS: Thank you. My name is
2 Kevin Kamps, with Beyond Nuclear. [The first
3 statement I would like to make is that the
4 Department of Energy should extend the public
5 comment period by an additional sixty days.
6 These environmental impact documents are a
7 foot thick, all together. The public needs
8 additional time to digest these proposals,
9 these analyses, and references, and to compare
10 and contrast them with the three foot thick
11 final environmental impact statement published
12 in 2002 by the DOE, in order to give
13 meaningful public comments.]

14 [My next point is about
15 transportation. Shipping many thousands of
16 high-level radioactive waste, trucks, trains,
17 and barges, through forty five states and the
18 District of Columbia risks severe accidents
19 and terrorist attacks. This could release
20 catastrophic amounts of deadly radioactivity
21 in major population centers. These waste
22 transports would represent potential mobile

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1 Chernobyls and dirty bombs on wheels, rolling
2 past the homes of millions of Americans.

3 A previous speaker gave an idea of
4 how much radioactivity is contained in every
5 single one of these shipments. The Department
6 of Energy must integrate into its Yucca
7 Mountain transport analysis its very own
8 proposals under the Bush Administration's
9 Global Nuclear Energy Partnership, or GNEP,
10 for waste imports from overseas. And then for
11 waste shipments to reprocessing, or plutonium
12 extraction centers in the United States. And
13 then waste shipments to Yucca for final
14 disposal. The DOE must also analyze the
15 increased transportation risks from its
16 proposal to nearly double the amount of waste
17 to be buried at Yucca to a 130,000 metric
18 tons.

19 Which on its face violates the
20 Nuclear Waste Policy Act, which limits the
21 amount of waste that could be buried at the
22 first repository to 70,000 metric tons, at

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1 least until a second repository is opened in
2 another state. And I'd just like to emphasize
3 the disconnect between the GNEP program and
4 this proposed Yucca Mountain project.] [The DOE 3
5 has proposed the equivalent of an earlier
6 plan. The current TAD canisters,
7 transportation aging and disposal, were first
8 proposed in the mid-1990s, only back then it
9 was called multipurpose canisters.

10 DOE needs to completely explain
11 why it is attempting to revive an idea that it
12 had dismissed as unworkable over a decade ago.

13 DOE should fully explain the increased risks
14 to workers and the public at and near the
15 reactor sites across the United States, where
16 these TADs would be loaded and permanently
17 sealed forever more. These risks would now be
18 shifted largely to the reactor sites, away
19 from the Yucca site, where they were
20 previously proposed to take place.

21 How will waste handling errors at
22 reactors, especially involving defective TAD

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1 canisters and damaged, irradiated nuclear
2 fuel, worsen transportation impacts? And
3 worse radioactivity releases at Yucca Mountain
4 over time? DOE should also explain the
5 disconnect between its GNEP proposal to
6 reprocess wastes and its current Yucca
7 Mountain proposal to permanently seal shut
8 wastes at reactors in TAD containers. That's
9 an apparent contradiction between DOE
10 programs.]

11 [How can DOE propose aging pads at
12 Yucca Mountain when the Nuclear Waste Policy
13 Act prohibits an interim monitored retrievable
14 storage site, co-located in the same state as
15 the repository? DOE's proposal is actually
16 illegal, for it attempts to place all of the
17 burdens, both interim storage and permanent
18 disposal, on one state.] [DOE needs to fully
19 analyze the earthquake risks at its proposed
20 interim storage site at Yucca, especially
21 considering the earthquake fault line recently
22 discovered directly underneath DOE's original

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1 aging pad location.]

2 [DOE has selected four companies to
3 design the TAD canisters. One of them being
4 Holtec International. But a whistle blower
5 from the largest US nuclear utility has
6 alleged and extensively documented for the
7 past seven years that Holtec's waste transport
8 and storage containers seriously violate
9 federal quality assurance regulations. This
10 calls into question the containers' structural
11 integrity, especially under transportation
12 accident conditions.

13 This industry whistle blower is
14 completely backed up by a retired US Nuclear
15 Regulatory Commission safety engineer and dry
16 cask storage expert. So how can DOE give such
17 a contract to a company that is clouded under
18 violations of quality assurance? Especially
19 after DOE's own extensive quality assurance
20 violations at the Yucca Mountain project
21 itself.]

22 [All of the land at Yucca Mountain

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1 is within the treaty lands of the Western
2 Shoshone Indian Nation, and for this reason
3 alone, this project should be terminated
4 immediately.] [A federal judge ruling against
5 DOE and in favor of the state of Nevada over
6 DOE's illegal use of water at the Yucca
7 Mountain project recently concluded that DOE
8 is either engaging in busywork at the site,
9 which is wasting not only water, but also
10 nuclear waste fund money, or else the DOE
11 mislead Congress and the President five years
12 ago when it said that site characterization
13 had been concluded when it announced the site
14 as suitable for a high-level radioactive waste
15 dump.

16 The Nuclear Waste Policy Act
17 required the Department of Energy to apply for
18 its license application on October 23rd, 2002.

19 The assumption was the DOE's site suitability
20 determination would mean that DOE must be
21 extremely close to ready to submit a complete
22 license application. Yet, incredibly, over

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1 five years later, DOE has still not submitted
2 its license application. DOE has known for
3 over a decade that rainwater percolates
4 relatively quickly through their proposed
5 burial site. In decades, not millennium. And
6 risks the fast corrosion of the waste burial
7 containers.

8 In fact, the DOE scandalously did
9 away with its own site suitability guidelines
10 that would have disqualified the site for this
11 very reason from any further consideration.
12 And it did so just before declaring the site
13 suitable. DOE should admit to Congress and
14 the President that the site is in fact not
15 suitable, and begin to conduct a sound
16 scientific search for suitable geology that
17 can isolate radioactive waste from the living
18 environment for a million years.

19 DOE must stop its attempt to rush
20 the submission of its still half-baked
21 licensing application by its own self-imposed
22 June 30th, 2008 deadline. This is an obvious

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1 attempt to initiate the Yucca licensing
2 proceeding before the pro-Yucca dump Bush
3 Administration leaves office, in order to try
4 to make the Yucca project a done deal, before
5 the next -- and possibly anti-Yucca dump
6 president enters the White House.]

7 [The National Academy of Science
8 has reported in recent years, in its seventh
9 biological effects of ionizing radiation
10 report, that any dose of radiation, no matter
11 how small, carries a health risk. And that in
12 fact, those health risks, at low doses, are
13 disproportionately high, greater than linear,
14 and significantly higher than previously
15 reported. DOE has engaged with the US
16 Environmental Protection Agency and the
17 Nuclear Regulatory Commission in secretive,
18 behind closed doors meetings, playing games of
19 hide the ball from the public.

20 All the agencies, including DOE,
21 must stop using statistical manipulations to
22 hide the actual levels of radiation dose

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1 exposure and the consequent health impacts
2 that vulnerable individuals and populations
3 would suffer over the next million years.]

4 MR. BROWN: If you can make just a
5 final point, there will be time after the
6 final speaker.

7 MR. KAMPS: Great.

8 MR. BROWN: If you want to finish
9 up, thanks.

10 MR. KAMPS: [My final point is that
11 nearly a thousand environmental, public
12 interest, consumer, and taxpayer
13 organizations, as well as many cities,
14 counties, and even states, representing
15 millions of Americans, have expressed
16 opposition to various aspects of the Yucca
17 Mountain dump proposal over the past twenty
18 years. The one to two million dollars per day
19 being wasted at the Yucca Mountain project
20 should be immediately redirected to securing
21 and safeguarding onsite waste storage at
22 reactors, for the wastes will inevitably

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1 remain in place for decades to come.] Thank
2 you.

3 MR. BROWN: Okay, thanks Kevin.
4 Okay, our next speaker is Nithin Akuthota.
5 And Ian Zabarte will be next.