webserver@yucca-web2.ymp.gov on 10/30/2006 11:16:03 AM

To: SEIS_Comments@notes.ymp.gov
cc:
Subject: NOI SEIS Comment

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October 30, 2006 11:16:03

IP address: 136.181.195.13

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The Commentors Name:
---> Thor M Strong

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The Commentors Address:
--->PO Box 30241
--->Lansing, Michigan 48909

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Email Information:
--->strongt@mi.gov
---> Add commentor to the mailing list : yes

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Contact Information:
---> fax number : 5172411326
---> phone number : 5172411252
---> organization : Michigan Department of Environmental Quality
---> position : Chief, Radiological Protection Program

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Comment Text :
-->The Michigan Department of Environmental Quality and the Michigan Low-Level Radioactive Waste Authority are supportive of the Supplemental Environmental Impact Statement in support of the Yucca Mountain repository (DOE/EIS-0250F, February 2002).

We have no comments on the particular scope of the Supplemental EIS. Rather, we voice our support for the "primarily canistered" repository design and operational concept that the Supplemental EIS will consider.

The most important benefit of the "primarily canistered" approach is that fuel handling will be minimized. The use of fuel canisters would minimize the handling of the waste, reducing the potential for waste handling accidents and resultant contamination problems, reducing worker exposure, and reducing the generation of low-level waste. Why handle the waste three times, when it can be limited to once.

In addition to the increase in safety, it seems that there would be significant cost savings in canistering the fuel assemblies at the plants.
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Extensive support facilities to repackage the fuel at the site would be unnecessary, and the time and staffing needs to prepare the waste package for placement in the repository would be substantially reduced.

Finally, eliminating the need for extensive fuel assembly handling at the repository would eliminate the "bottleneck" in the system. It would permit earlier and more rapid receipt of waste at the repository, and allow for fluctuations in waste receipt rates. Increasing the facility "throughput" could significantly reduce the operational period of the repository, saving perhaps billions of dollars.

The earlier concept providing for fuel repackaging at repository site was to allow for proper "fuel blending." It seems that adequate fuel blending can be accomplished at the plant site, and in fact doing so would contribute to the safe transport of the fuel. A canister which was welded shut would provide one additional barrier against exterior contamination and purposeful intrusion.

We encourage the careful evaluation of this issue. The extensive use of canistered fuel could provide major safety and worker exposure benefits, reduce repository infrastructure and operational costs, and significantly improve overall repository performance.
