


010084


Lee Morton

12/12/2006 03:34 PM

To: Wendy Pagan/YM/RWDOE@CRWMS
cc:
Subject: seis only

LSN: Not Relevant
User Filed as: Not a Record

----- Forwarded by Lee Morton/YM/RWDOE on 12/12/2006 03:36 PM -----

From: Jane Summerson on 12/12/2006 05:00 PM EST

To: lee morton
cc:
Subject: Fw:

User Filed as: Not Categorized in ERMS

Fyi

Sent from my BlackBerry Wireless Handheld

----- Original Message -----

From: "RIVES, FRANK B" [FRIVES@entergy.com]
Sent: 12/12/2006 04:45 PM
To: <jane.summerson@ymp.gov>
Cc: McCULLUM, Rodney" <rxm@nei.org>; SMITH, JAGER", <JSMIT83@entergy.com>;
FRANKLIN, CHARLES B" <CFRANKL@entergy.com>; Silberg, Jay E." <jay.silberg@pillsburylaw.com>; GALLMAN, ROSE A" <RGALLMA@entergy.com>

December 12, 2006

Dr. Jane Summerson
Environmental Impact Statement Document Manager
Regulatory Authority Office, Office of Civilian Radioactive Waste Management
U.S. Department of Energy
1551 Hillshire Drive
Las Vegas, NV 89134

Entergy Comments on the U.S. Department of Energy Notice of Intent: Supplement to the Final Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada, 71 Federal Register 60490, October 13, 2006

Dear Dr. Summerson:

Entergy is pleased to comment on the Department of Energy's Notice of Intent (NOI) regarding a proposed Supplement to the Final Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive

Waste at Yucca Mountain, Nye County, Nevada (DOE/EIS-0252). The comments are found in the attached letter. If you have any questions, please do not hesitate to call me at (601) 368-5750.

Frank B. Rives
Director, Nuclear Fuels
Entergy Services, Inc.

NFFN-0048



NFL-2006-0085.pdf



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Frank B. Rives
Director
Nuclear Fuels

NFL-2006-0085
December 12, 2006

Dr. Jane Summerson
Environmental Impact Statement Document Manager
Regulatory Authority Office, Office of Civilian Radioactive Waste Management
U.S. Department of Energy
1551 Hillshire Drive
Las Vegas, NV 89134

Subject: Entergy Comments on the U.S. Department of Energy Notice of Intent: Supplement to the Final Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada, 71 Federal Register 60490, October 13, 2006

Dear Dr. Summerson:

Entergy Services, Inc., on behalf of Entergy Corporation and its subsidiaries that own, operate, and provide fuel services to the Entergy fleet of nuclear power stations (Entergy)¹, is pleased to submit comments on the Department of Energy's Notice of Intent (NOI) regarding a proposed *Supplement to the Final Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (DOE/RIS-0252)*. Entergy is generally supportive of the comments being submitted by the Nuclear Energy Institute and hereby provides the following additional comments:

- The Department of Energy (DOE) must recognize that, due to delays in the operation of the Yucca Mountain repository, over 10% of the total inventory currently allowed by law for disposal at Yucca Mountain has already been placed in dual purpose casks at reactor sites, and in storage-only casks that may become licensed for transportation. Nuclear plant owners and operators will be forced by the continuing Yucca Mountain delay to load more of these casks prior to the availability of any standardized transportation, aging and disposal (TAD) casks.
- It is very important that DOE's facilities at Yucca Mountain include those needed to accept, and to repackage if necessary, the large amount of fuel that is already loaded in

¹ The related Entergy subsidiaries include at minimum Entergy Arkansas, Inc., Entergy Louisiana, Inc., System Energy Resources Inc., Entergy Gulf States Inc., System Fuels, Inc., Entergy Operations, Inc., Entergy Nuclear Generation Company, Entergy Nuclear Fitzpatrick, LLC, Entergy Nuclear Indian Point 2, LLC, Entergy Nuclear Indian Point 3, LLC, Entergy Nuclear Vermont Yankee, LLC, Entergy Nuclear Operations, Inc., and Entergy Services, Inc., although this list may not be exhaustive. These companies own, operate, and provide services to at least the following nuclear power stations: Arkansas Nuclear One Units 1 & 2, Waterford 3, Grand Gulf, River Bend, Pilgrim, Fitzpatrick, Indian Point 2 & 3, and Vermont Yankee.

casks that are or will be licensed for transport. It is not efficient, cost-effective, or consistent with ALARA worker radiation exposure principles for fuel in such casks to be re-handled and repackaged at reactor sites (such capability does not even exist at some shutdown sites).

- DOE should consider that the use of TADS instead of currently-available dual purpose casks will increase costs to nuclear plant owners and operators because the proposed TADS hold less spent fuel than the current dual-purpose casks. Assuming the availability and use of TADS for storage prior to Yucca Mountain commencement of fuel receipt, many TADS may also be loaded and stored at reactor sites due to the continuing Yucca Mountain delay.

If you have any questions, please do not hesitate to contact me at (601) 368-5750.

Sincerely,

A handwritten signature in black ink, appearing to read "M. B. Thi". The signature is written in a cursive, somewhat stylized font.

FBR:rag

NFFN-0048
