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Wayne Norton
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WAN-07-01

Jane Summerson, Ph.D.
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

Christopher A. Kouts
Director, Waste Management Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: Comments by Yankee Atomic Electric Company, Connecticut Yankee Atomic Power Company and Maine Yankee Atomic Power Company 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 and Mr. Kouts:

Yankee Atomic Electric Company, Connecticut Yankee Atomic Power Company and Maine Yankee Atomic Power Company (the "Yankee Companies") are pleased to provide these comments on (1) the Department of Energy's Notice of Intent 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, 71 Federal Register 60490, October 13, 2006*, and (2) the Office of Civilian Radioactive Waste Management's Preliminary Transportation, Aging and Disposal Canister System Performance Specification, Revision A, November 2006.

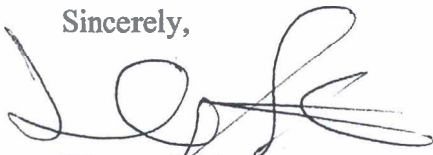
The Yankee Companies' nuclear power plants are decommissioned and their spent nuclear fuel is currently stored in transportable dry storage containers licensed by the NRC. The Yankee Companies' spent nuclear fuel is among the more than 9,500 metric tons of spent nuclear fuel that industry has already placed in dry storage systems that are not TADs. For these reasons, the Yankee Companies wish to stress how important it is to assure that DOE's plans for development of the Yucca Mountain repository continue to accommodate the substantial volume of spent nuclear fuel that will arrive at the repository in dry storage systems that are not TADs. For similar reasons, any plans that DOE may develop for interim storage of spent nuclear fuel also should accommodate dry storage systems that are not TADs.

In particular, the Yankee Companies strongly support DOE's decision to include a wet handling facility among the primary surface waste handling facilities at Yucca Mountain. As described in the NOI, "[t]he wet handling facility would receive commercial spent nuclear fuel as bare fuel assemblies (uncanistered) or in dual-purpose canisters, either in truck or rail transportation casks. Commercial spent nuclear fuel would be transferred underwater from the transportation casks or dual-purpose canisters into TADs." This wet handling facility is a vital component of the Yucca Mountain surface facilities. It will assure that the Yankee Companies (and other industry members who have already stored their spent nuclear fuel in dry storage systems other than TADs) are not penalized for taking responsible and reasonable steps to mitigate the effects of implementing DOE's long delay in implementing a permanent used fuel storage facility. The Yankee Companies also specifically endorse the comments of the Nuclear Energy Institute, dated December 12, 2006, concerning the importance of a wet handling facility at Yucca Mountain.

The NOI states that the "surface and subsurface facilities" at Yucca Mountain will be "constructed in phases to accommodate the expected receipt rates of spent nuclear fuel and high-level waste." Because the NOI is not specific about the phasing of this construction, the Yankee Companies urge DOE to take the necessary steps to assure that the wet handling facility is completed and operational at the outset of repository operations. Otherwise, the phased approach to construction will further delay acceptance of spent nuclear fuel from the Yankee Companies and others that use dry storage systems other than TADs, and thereby increase the damages the government must pay for DOE's delayed performance of its contract obligations.

Thank you for the opportunity to comment. If you have any questions, please do not hesitate to contact me at 860-267-3690.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wayne A. Norton', with a stylized flourish at the end.

Wayne A. Norton
Chief Nuclear Officer