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To: Mr. M. Lee B. Wang, EIS Document Manager,
Office of Logistics Management, OCRWM, US DOE

Public comments of James Shillinglaw on The Fed. Reg. Amended Notice of Intent to Expand the Scope of the EIS for the Alignment, Construction, and Operation of a Rail Line to a geologic repository at Yucca Mt.

1. We in Wisconsin want to know if barges are to be used on Lake Michigan. We have asked this since the 1st dry cask was loaded at our Pt. Beach plant and we had an explosion in it. There is no rail service there so far as I'm known about. Will you build it? Where is a map of proposed routes through Wisconsin? We need that now before we can evaluate your plan. Where will + tracks be used? We want to know. Will the + rails be dedicated? What happens in Wisconsin, affects what happens on the whole transport route of nuclear waste. It is integrated. We need some information.

2. The promise years ago was oldest fuel 1st; then there was talk of plants being able to decide and make changes in the lineup by so changes with other plants. Are secret deals between utilities being made? Yucca Mt., by law, is not supposed to be for storage. "Aging" (TAD's middle initial is for "aging") is storage and this is not to be done at Yucca Mt. Are you trying to get around this plan of intent for storage to be at the utilities until ready for disposal?

3. TAD's is an old plan from years ago and was rejected because of the problem of the utilities closing the canisters before transport and no way of knowing

(2)

What happens to the pellets, cladding, CRUD, baskets, assembly parts, welds, etc. etc. throughout the journey to Nevada. You can't seal it at the plants, hope the handling - lifting, bumping along the rails, roads, and waterways won't affect the load, and just put it in an alloy 22 overpack and pump it. That was rejected long ago. Why is it all of a sudden OK now? You need to inspect, document, and monitor each container before it leaves the utility and randomly open plenty of them at Yucca mt. to verify the condition of both the inside of the outside of the inner canister in that fragmentation overpack. Otherwise all the money spent on computer modeling and all these years of scientific study depend on one thing = your hope that what is inside that canister, that travels cross country, is in the shape you want it to be. That won't due to protect public health and safety.

4. You are scoping possible corridors without knowing really what will be traveling through these corridors. That is backwards. How can you figure an impact if you don't even know yet if the plants can't do the "blending" job you expect of them at their pools. You don't know yet what the fuel in storage in pools all over the country, will be like; you haven't opened them. The pool chemists and CRUD on the fuel is different at each utility. Handling devices, transfer casks, room available for handling at pools, transporters, etc. have not been figured out. You don't know if utilities will do this or can

do this the way DOE wants them to. (much less who pays the costs!) You can't figure all the impacts of something you have yet to define. Surely we don't know in Wisconsin.

5. I do know that huge rocks have been put around the Keewaunee plant (like a big wall) apparently to keep out truck bombs. I do know that all the local papers have recently had articles about the Coast Guard plans to have munitions testing grounds all over Lake Michigan that has created a lot of controversy here already with tourists, sailors, fishermen, ferry boats, etc. Obviously sabotage and terrorism are concerns here on the Lake and shore. What happened in Wisconsin may affect everything else in the transportation route. This all should have been thought out long ago, and many in the public asked about transport plans at our 1st hearing here on day care storage.
6. Environmental justice is being thrown out the window if you are now considering the Mian route. The only thing I can figure is that money has persuaded the Walker River Paiute Tribe to let them now consider crossing their reservation. What is the true story here? This is sad. And I'm ashamed of the DOE for doing this to native americans over and over again.
7. You say (Fed Reg p. 60486) the Mian corridor appears to offer potential advantages to the extent it would cross fewer mountains, utilize existing railbeds, and be

(4)

a shorter distance." However the main reason seems to be costs. Are you planning to give the money you "save" to the native tribe there to kick them into allowing you to mess up their reservation? What has happened since that letter of Dec 6, 1991 you reference, to May 2006? Seems very strange to me. And frankly I don't see why that tribe should be affected by waste from nuclear plants in Wisconsin that were stored in the 1st generic cask designed, and certified by NRC — it was a mess. I'm glad to get it all out of here, but I sure don't see why that tribe (or Nevada) needs to deal with waste we created in Wisconsin.

8. What mountains have to be crossed? What are the grades? Will there be dedicated tracks? What else will be allowed to travel on the tracks with these trains? Heavy loads? How close? How will the loads be monitored on the way?
9. Have all the "what ifs" of transport accidents been evaluated for everything on the route — Reverses? Bridges? Tunnels? Traffic jams or accidents on a highway holding up a train? Weather? If a cask has a problem — what are emergency plans? How do you get a problem cask off the train? Then ** what do you do with it? I'd like to see a detailed emergency procedure — especially if it happens on the Mina route? What emergency crews are there?
10. Terrorism and Sabotage on the route certainly are possible. Think like they do — what could they do? How are drivers certified? Checked? Will there be backups if one is sick en route, or sleepy?

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You need a lot of drivers for all these trains and trucks and a lot of security men. What will all this cost?

11. If a plane hits a truck or train loaded with casks, what is the impact — including a full load of fuel on the plane and on the truck or train? Fire is a big threat! and we now know what a few men, with a few planes, can do! If you were a terrorist, where would you decide to hit a load to do the most damage? Near the test ~~site~~ site? Near a full array of storage casks on a pad on the surface of Yucca mt? Think about it. It scares me. What a target! Is the Mira route a set up for something like this?

12. Mountains and curves are trouble for brakes on trains and trucks with heavy loads. What is the evaluation of "run away" incidents possible in a never used before system?

13. We need full scale, time testing of all new cask designs. Have these transport overpacks ever been used? Has a TAD container ever even been built or fully designed yet? How will they be lifted? How will they be sealed? How will the welds be tested? What will DOE criteria be for contents? The TADs idea affects the whole waste system, yet is being thrown in here at the end as a proposal to solve problems — I think it just creates more.

Thank you for considering my comments.
Tara Shillinglaw