

MR. KAMPS: My name is Kevin Kamps and I represent Nuclear Information and Resource Service.

I do have written comments that we will get in by the deadline, but I just wanted to say some things orally that I kind of have thought about being here today.

The first thing I'd like to bring up is that we several days ago wrote a letter to the Department asking for a postponement of the hearing and an extension of the comment period to 90 days instead of 45 and a postponement of the hearing towards the latter half or actually the last month of the 90 day period to give ourselves enough time to study the proposal, compare it to past proposals at the Yucca Mountain project. And we have not heard back. Obviously, I have not heard back as one of the signatories to that letter in time for this hearing. So would like to make that request again at this point.

Would like to request that hearings be held in Salt Lake City, Utah and Sacramento, California. Because under the new proposal of the Mina corridor, those two cities, capitals, population centers would be impacted significantly by increased numbers of shipments. And we're concerned about the safety and security of the shipments going through those population centers and think that those cities certainly deserve hearings. But we also feel that hearings should be held in crossroad corridor communities. Places like Chicago, Illinois, St. Louis, Missouri, Kansas City, Missouri, Lincoln, Nebraska, Atlanta, Georgia. Places that did have hearing back in 1999 and 2000 during the draft Environmental Impact Statement proceedings for many of the same reasons that the DOE decided to hold hearings there previously, because these are transportation impacted communities and it's a national proposal.

But I would also add a request for hearings in the reactor communities themselves because the TAD proposal is requiring operations at reactors that have not been foreseen before, that are not licensed for. And so a call for hearings in the impacted reactor communities. And that's what I would like to comment on a bit from what I've picked up talking to various DOE officials here this evening.

One question I have is if the Department of Energy is requesting or demanding of the utilities that they receive the TADs and load them at the reactor site, who is liable for those operations? Is it the Department? Is it the utilities? I asked one DOE official here what the worker doses would be from these operations and didn't really get a clear answer this evening.

So one example that I give is the Big Rock Point Nuclear Power Plant in Michigan, which is permanently shutdown for about a decade now. The pool has been dismantled. It's not there anymore. They don't have a hot cell. They have seven containers of irradiated fuel and one container of greater than class C waste. So my question is, unless those dry casks are TADs, which I don't think they are because I don't think the design for the TADs has been finalized -- and that's one of our objections to this hearing is we don't have enough information to be making full and meaningful comments because the Department hasn't provided enough information for us to do that. But the Big Rock dry casks, how are the materials in those dry casks going to be transferred into TADs? So that's a question I have. Is this 90 percent, 10 percent breakdown of TADs versus uncanistered, does that refer to the dry casks that already exist, the 700 to 800 dry casks, is that the 10 percent that will be uncanistered? But the reason that doesn't seem to be the case to me is that some of those dry casks are canistered. The whole tap containers for example that are

deployed at Dresden and many other places in the country have a welded shut inner canister already. And when I spoke to a DOE official here this evening, I asked him what about those permanently welded shut inner canisters? And his response was nothing is permanently welded shut. And so what he was getting at and what he then said was they can be opened up. They can be cut open and the waste can be removed and put into a TAD.

And my follow up question that I didn't get a good answer on was what are the worker doses going to be from that and who is liable for those operations? Because these are potentially dangerous operations, especially to the workers themselves.

So that's a question I have about the TADs that I think needs to be within the scope of this EIS on the TADs. Is a -- especially the dry casks that already exist in the United States. What future do they have under this proposal? So that's a big one.

Another answer that I got from a DOE official this evening was that the facilities already exist at the reactor sites to do this work, to do the loading of the TADs. And I think that that issue needs to be well within the scope and fully studied and analyzed by the DOE, because from my experience at the reactor sites that is not the case.

I gave the example of Big Rock, which does not have a pool. It does not have the hot cell, but it does have high-level waste on site. So how is that waste supposed to be transferred into a TAD without those facilities on site? That's just one example of many in the country.

Other equipment that might be needed that's not there right now would be cranes with sufficient lifting capacity. Depending on the design of the TAD, that could get into some logistical problems of even the space to work in inside some of the pool areas in the country. So I think that issue that seemed to be brushed off by one DOE official here

tonight, that the equipment and the facilities already exist, I think that needs to be looked at very carefully.

An example from an earlier DOE proceedings that I think sheds some light on that would be DOE's work on the transportation infrastructure in the United States. The proposed barge shipments, for example on the Missouri River where proposed shipments would go up the Missouri to Omaha, Nebraska to be then loaded onto trains. But the part that the Department of Energy missed was that the cranes in Omaha, Nebraska are not sufficient to lift such heavy weights. So those are the kind of details that needs to be fully scoped out across the country. And unfortunately there's enough difference at reactor sites that every single reactor site is going to need to be looked at very carefully. And that I think further supports our call for hearings at each of these reactor sites in the country.

And of course you know, a 45 day comment period is not going to allow for that many hearings. The DOE doesn't have that much personnel so that's another reason we call for a longer hearing period. And I think further support for that call is that DOE has admitted recently that 2017 is the earliest opening date for Yucca. And so we have 11 years before DOE even admits that Yucca can be opened. And I think that these proceedings have to go forward much more slowly than is proposed.

And that's another objection that we have it that the DOE has launched two very complex NEPA proceedings at the same time on top of each other. And it's creating a lot of confusion amongst the public, especially given the notices that were in the Federal Register. Because if you read that notice, this hearing tonight was not really for consideration of the transportation impacts of the new Mina corridor. That's how it was written. Tonight's hearing in Washington was for the repository changes alone. So that's a

part of why we're calling for the Notice of Intents to be withdrawn and reissued. To be done much more carefully to make it clear that everyone of these hearings is for both proposals. And we would actually call on the Department of Energy to do one proposal at a time and not both at the same time, because it's too confusing to the public. They need to be broken up and there's enough time to do that. There's years -- years ahead to work on these issues.

MR. JONES: So do it sequential, we'd rather do them simultaneously.

MR. KAMPS: One at a time.

MR. JONES: Yes. Okay.

MR. KAMPS: And the rest of our comments will be submitted for the record at a later point.

MR. JONES: Okay.

MR. KAMPS: Those were just things that came out tonight.

I think one other that comes to mind before I close is again talking to a DOE official, looking at the poster that showed the proposed drift design at Yucca Mountain, I asked some questions about personnel, human beings going into the north portal, which will be the entryway for the waste to be delivered into the mountain. And I asked if work had been done on worker doses. What kind of worker doses would those people be exposed to working in that tunnel, doing maintenance and such. And he seemed to say that the worker doses would be very small.

I then asked if exterior contamination of the waste containers going into the mountain have been considered. And he said very minimal contamination was assumed. Not very significant. And I think that the Department of Energy as a part of its scoping should look at international experience with exterior contamination of waste containers, and

France comes to mind. In the late 1990's 25 percent to 33 percent of the French transport shipments into the reprocessing center La Hague were contaminated externally and that's because they were -- the canisters holding the waste were filled in the pools, which I believe is what's going to happen with the TADs under the DOE proposal, but the TADs are going to be lowered into waste pools. And they can pickup contamination in the waste pools. And that contamination can work its way even to the outside of the waste transportation containers.

So there could very well be contamination going into the north portal that the workers will be exposed to from the containers themselves or from the portal area because contamination is going to fall off of the containers and contaminate the facility itself. And I don't think that from the response I got this evening that the Department has looked at that carefully enough.

And I would add that the public will also be exposed to these containers as they're transported by road, by rail, by waterway. And that was the experience in France as well. The transport containers came in very close proximity to the public. A waste transfer facility was located a short distance from a train station where people were waiting for significant periods of time in fairly close proximity to these contaminated containers. So the Department as part of this EIS proceeding needs to look at those impacts across the country with the train shipped TADs, but also with the uncanistered waste that would be on trucks. And the trucks of course could come in even closer proximity to the public at places like rest areas, in traffic jams. The trains too could come in close proximity in rail yards where the containers might be stored for a time until they continue their journey across the

country. So people who live close to these rail yards, the rail yard workers, inspectors, a lot of people who do not consider themselves nuclear workers.

And I think as a part of the scoping tier the Department as a matter of openness and transparency has to make clear to the American workforce, whether or not they're being considered nuclear workers, and if that in fact increases their allowable dose. So as an example inspectors, rail yard workers, locomotive engineers, toll booth attendants, gas station attendants, people who certainly don't consider themselves nuclear workers, I think that needs to be very clearly communicated to the public in this proceeding what they're -- what they're seen as.

And I think that will do it for tonight. But we'll be submitting comments for the record.

MR. JONES: Okay. And you have the information where to send that, I'm sure.

MR. KAMPS: Yes.

MR. JONES: I mean the addresses.

MR. KAMPS: Yes.

MR. JONES: Okay. Okay. Thank you.