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13 MS SUPKO: Good evening. My name is Eileen
14 Supko; I'm a nuclear engineer. I work for Energy
15 Resources International in Washington, D.C. We're
16 an energy consulting company. I specialize in
17 nuclear waste consulting, spent nuclear fuel
18 storage transportation and disposal issues. My
19 clients are nuclear utilities, nuclear industry
20 organizations. I became a nuclear engineer,
21 actually, after the accident at Three Mile Island,
22 having grown up in Pennsylvania, because I felt
23 that nuclear power was a necessary energy source
24 that we needed to have in the United States as an
25 alternative. And I felt that becoming a nuclear

1 engineer was a responsible action on my part in
2 being able to come out in forums like this to talk
3 about nuclear issues. I'd like to thank DOE for
4 the opportunity to make comments about the Draft
5 Environmental Impact Statement.
6 I believe the publication of the Draft
1 7 Environmental Impact Statement of Yucca Mountain
8 is an important step forward for the resolution of
9 our nation's nuclear waste dilemma. The DEIS
10 findings demonstrate that the impacts of moving
11 forward with Yucca Mountain are small, and I
12 believe that the federal government should make a
13 positive finding on the proposed action.
14 There have been some comments this afternoon
6 15 and this evening regarding that movement of spent
continued
on page 3 16 nuclear fuel won't create fewer sites with nuclear
17 waste but will create just one more. And I would
18 actually like to say that that's really not true.
19 As soon as the Department of Energy disposal
20 facility or -- I personally would prefer an
21 interim storage facility to start sooner than
22 that. But as soon as the federal facility for
23 spent nuclear fuel begins operation, there will,
24 within a matter of several years, be at least ten
25 to twelve fewer sites storing spent nuclear fuel

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6 continued 1 because we have quite a number of shutdown nuclear
2 reactors around the country, and fuel would move
3 from those sites.

2 4 There's also been a lot of discussion this
5 afternoon, as is correct to have this amount of
6 discussion, on nuclear waste transportation. It's
7 the issue that affects most of the country, with
8 highways and railroads going past all of our
9 communities. And I think all parties can agree
10 that public health and safety and protection of
11 the environment are vitally important. And that
12 is a primary goal that I saw in the Draft
13 Environmental Impact Statement. I'd also like to
14 reiterate some statistics that I gave earlier this
15 afternoon on spent fuel shipments in the United
16 States. Over the past 30 years there have been
17 approximately 3,000 cask shipments traveling on
18 our highways and railways in the United States of
19 spent nuclear fuel from commercial reactors and
20 research reactors. And in addition, there have
21 been about 700 shipments of Navy spent nuclear
22 fuel. Internationally, there have been 30,000
23 cask shipments of used nuclear fuel in the past 30
24 years. The majority of those were in the United
25 Kingdom, shipping spent nuclear fuel from the

1 older reactors there to the reprocessing facility.
2 Putting that into perspective with what we're
3 planning to do here in the United States in the
4 future with this program, the most likely scenario
5 is that there will be between 10 and 15,000
6 shipments of commercial spent nuclear fuel in the
7 U.S.. That's about half of what's been done
8 internationally already.
9 Given the importance of transportation to
10 everyone in this room and around the country, I'd
3 11 like to make a few observations regarding the
12 transportation analysis in the Draft Environmental
13 Impact Statement. I found it to be extremely
14 comprehensive. Even if, indeed, we did not report
15 the results on a route-specific basis, as they
16 acknowledged, they did actually do the analysis on
17 a route-specific basis. The bounding analysis
18 used by the DOE was meant to -- for the purposes
19 of bounding the impact of transportation -- what
20 are the upper and lower limits? -- in order to
21 give policy makers the ability to look at the
22 impacts of this action and decide whether those
23 impacts were reasonable. The DEIS does in fact do
4 continued on page 5 24 that. At this point in time the DOE acknowledges
25 they don't know what the exact mix of rail and

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truck transportation will be. It's likely to be mostly rail because nuclear reactor sites are moving toward being able to handle large packages, and the facilities will be in place at reactor sites to handle large packages, which is necessary for rail transportation. I don't believe that specific route analysis is necessary at this time because of the bounding nature of this data presented by DOE. The EIS clearly identifies virtually the entire U.S. rail and highway system as potentially impacted by this action and conservatively evaluates this impact. Specific route planning, which will involve state and local governments and local communities in selection of preferred routes in states which they so choose will be done closer to the time of the actual movement of spent nuclear fuel, and they will also involve state emergency planning organizations, as was mentioned earlier today, as specified in the Nuclear Waste Policy Act, section 180(c).

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It's my opinion that the EIS overestimates some of the impacts of spent nuclear fuel transportation. Due to DOE -- what I understand is DOE NEPA guidelines, transportation events with a probability of greater than one in ten million

5 continued on page 7

1 or, in nuclear engineering jargon, 10 to the minus
2 seventh, have been considered to be credible in
3 assessing severe accident risks, which is
4 inconsistent with public policy elsewhere, which
5 considers events with a probability of greater
6 than one in a million or ten to the minus sixth,
7 for accident analysis. What does this mean? If
8 one has bumped up the cutoff criteria for
9 accidents such that accidents that are not
10 credible are included in the analysis, one is
11 overestimating the consequences of a severe
7 12 transportation accident. DOE also doesn't assume
13 any mitigation for the transportation accident
14 scenario, which is misleading given that in the
15 unlikely event of a severe accident, emergency
16 response will occur swiftly and a comprehensive
17 plan will be developed to mitigate the
18 consequences of an accident. We have emergency
19 response capability on a federal level to respond
20 to the radiation accidents in the United States,
21 and radiation workers would be available to assist
22 in the unlikely event of an accident, as well as
23 to train emergency response workers across the
24 states.
25 MR. LAWSON: Okay. You have 30 seconds.

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MS. SUPLO: I believe that the EIS demonstrates that impacts of spent fuel transportation are small, even considering that DOE overestimated transportation impacts. This result is confirmed by more than 30 years of spent nuclear fuel transportation in the U.S. and around the world. Thank you.

MR. LAWSON: Thank you. Now, did I have a couple of other hands over here?