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MR. DAVID KRAFT: Thank you. My name is Dave Kraft. I am director of Nuclear Energy Information Service in Evanston, Illinois.

I gave some comments earlier today and I want to add a couple more based on some of the earlier comments and information that has been passed out. My comments earlier today were a bit harsh on DOE for some of the inconsistency in the process, changing of standards, things like that.

Half of my remarks will provide an opportunity for DOE to perhaps capture, recapture some of the credibility and stature that they need to if they are going to continue, but I want to begin talking about shipments themselves, because Illinois has a unique situation.

1 We had Gordon Appel here earlier today, who is a deputy director of the Department of Nuclear Safety. Illinois may well be, I think, the only state in the country that has a cabinet level Department of Nuclear Safety. And in this instance I want to give them praise, because 15 years ago when they were formed, one of their members named John Cooper, who was formerly with NRC, was the one who insisted that all high level RAD shipments be escorted into, through and out of Illinois.

Now, those were in the days when shipments were one maybe every six to eight weeks for maybe a two- or three-month period. Now we are talking something quantitatively much greater. I just confirmed, five casks per day is orders of magnitude, almost, difference.

The concern, and this gets back to the EIS, though, is what is the cost and who bears the cost for these escort services that the Department of Nuclear Safety believes is essential to protect the public health and safety in Illinois? Well, if you take the numbers of projected shipments and over the 24-year period of the project, you have to take into account every one of those shipments will involve a minimum of seven state, federal and local agencies, including the governor's office.

I have repeatedly asked DNS if they could give me a ball park figure of what it would cost per shipment if you added all the costs. They haven't been able to come up with that yet. I hope someone will get that on the record at some point. But if you assume a \$10,000 cost, which I believe is probably very low, given that seven major agencies are involved per shipment, you come out with a staggering figure of \$312 million over the 24-year period of this project just for Illinois.

And if you decide that you want to give equal protection to the other 43 affected states, this gives you a maximum boundary of 13 and a half billion dollars just to escort these shipments around the country. I think this is something that the legislators, who will be taking up the Yucca Mountain Mobile Chernobyl bill tomorrow, really need to take a look at. But I do want to go on the record lauding the Department of Nuclear Safety for their escort efforts. |

2... Now, to come back to the Department of Energy, | I heard two bits of information that was put on the record earlier today which I believe is erroneous, and I would ask that in future hearings or in future public situations, that the DOE take the lead and correct these misinterpretations.

2 The first that I constantly hear is that this project is going to consolidate 77 sites into one site and isn't that environmentally better. Well, it is, but that's not going to happen for a long period of time. In fact, it's illegal to reduce the number of sites, the spent fuel pools and simultaneously run nuclear power plants. So the correct figure is really that the Yucca Mountain project is adding the 78th facility until such time as the reactors begin to shut down.

You cannot operate a nuclear reactor in this country unless you have an operating spent fuel pool. So Yucca Mountain, the DOE needs to go on record publicly saying this is actually the 78th high level radioactive waste facility until such time as the nuclear power plants shut down.

3 I would also ask the DOE to help clarify in the public's mind the interpretation of the legal decision by which they are being asked to take title of the waste. The nuclear industry has been trumpeting this, that the courts have said DOE must take physical possession of the waste. That is not accurate. I would ask that DOE step forward and correct that misinterpretation. The courts have dumped it back in to the arena of the contractual parties, the utilities and the agency to come up with the solution for how they physically deal with the waste. All the court did was validate the fact that DOE is responsible for it and has a financial obligation to the public and to the utilities. So I think it's a misperception that the utilities are saying that the court's are ordering that this waste be moved immediately. That is not true, and I ask that DOE be the agency that sets the record straight.

Thank you.