

RECEIVED

GORDON APPEL

JAN 20 2000

MR. APPEL: Illinois is very careful about its sovereignty and would never presume to be the home state of the wonderful City of St. Louis. My name is Gordon Appel. I am the deputy director of the Illinois Department of Nuclear Safety. I'm going to make a few comments here today and then we will comment formally on the EIS during the comments period. Our department in Illinois has a very broad responsibility relative to the regulation and public safety of almost all radioactive materials. The only aspect of the use of radioactive materials that we do not regulate in the state of Illinois is the operation of nuclear power plants.

1 We are responsible for the inspection and escort of spent fuel and high-level waste through the state of Illinois. That is the State of Illinois' approach to insuring that the transport of these materials happens safely in the state of Illinois. Since 1983 we have transported over 450 high-level waste and spent fuel shipments through the state of Illinois for various purposes. One of the aspects of the EIS that is most troublesome to us is that it appears, from examining the transportation-related issues in the EIS, that there really are no other transportation routes in the country except for those that go through the state of Illinois, and I think if you look at a map, you will find that that is probably not the case, and we would urge the DOE to reevaluate that issue.

I mean, we understand that these materials should be transported and that undoubtedly they will have to be transported through the state of Illinois; however, the volume of materials that are projected to be transported through the state of Illinois in the EIS I think is really unrealistic and unnecessary, and to a certain extent, I think is intentional. And while we are confident that we can staff up and meet the challenge of potential acceleration of shipments of spent fuel through Illinois in the future, we think there are a couple of things in the EIS that DOE can address better.

2 They seem to have not been able to come to conclusions relative to the mode of transportation of fuel from various facilities, and I think that's something that they could really address in a lot more detail. They seem to be unable to predict a specific mode of transport from various facilities and we know where those facilities are today and we know where the end point of the shipment route is and there should be an effort to be more specific about the mode of transportation.

3 A related issue is that relative to rail transport, the EIS has made the assumption that -- or the assumption has been made and it is reflected in the EIS that the railroads will choose the routing of shipments based on their historical practices, and again, the Department believes the DOE needs to really accept the responsibility for choosing the safest routes available and then specifying those routes through contractors and carriers rather than abrogating that responsibility and leaving it up to the railroads to decide routing issues.

MR. BROWN: Four minutes.

4 MR. APPEL: Lastly, I would like to point out that, as we have been in the past, the Department remains committed to working with the Department of Energy on deciding routing issue in the state of Illinois, and we urge you to contact us and consult with us relative to those issues within the state of Illinois. Thank you.