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KLAUS SCHUMANN

MR. SCHUMANN: Yeah. I have to speak after somebody like her. I do agree with her.

1 My name is Klaus Schumann. I represent the California Green Party, the San Luis Obispo County chapter. We have the Diablo Canyon Nuclear Power Plant in our county. I'm also a member of the San Luis Obispo Nuclear Waste Management Committee. Like Green Parties everywhere on earth, the whole Green Party opposes nuclear power and wishes that nuclear waste had never been produced. Therefore, we first of all urge stop producing spent fuel now.

How much sense does the technology make which benefits just one or two generations, but then burdens the next 8,000? Without bail-out, nuclear power cannot economically compete in a deregulated market, and it's easily replaced with safer and environmental technologies.

2 However, we do recognize that about one-third of the spent fuel is already there and it has to be dealt with whether we like it or not. It is in this context that our comments must be understood. Basically we demand that you draft a new EIS. There are simply too many flaws in the present one. Moreover, we protest that this entire process is much more driven by the short-term financial interests of the nuclear industry than the health and safety interests of the public which you are supposed to represent. To cite just one example, Congress mandates that the transportation of spent fuel must be commercially viable. Right off the bat, public health and safety issues take a backseat, which has a direct implication ranging from past design to testing requirements to how, where and when spent fuel is transported or stored on-site at the reactor.

Specifically we raise the following six concerns, and due to time constraints, I shall highlight the first five and then go into more detail on the last one.

4 First, the public hearings, including this one, have not been sufficiently enough. Second, the Draft EIS contains no preferred transportation route to our county or anywhere else. Third, the DEIS does not consider the economic impact of stigma or perception associated with the proposed action nor does it evaluate any mitigation options.

7 Fourth, while your draft does include the position of the Native American Indians from Nevada on the issue of environmental justice, it does not respond to their valid concerns. Fifth, like most power plants, Diablo Canyon lately operates with enriched fuel allowing longer stay of the fuel rods in the reactor. Since there is no empirical evidence -- empirical evidence for the rate of cladding failure on these spent fuel rods with higher burnout, all risk assessment and analyses for accident and sabotage/terrorist scenarios are conjecture. In addition, calculation about thermal loads for cask determination may also be affected. The Draft EIS does not address this important aspect and is therefore seriously flawed.

9 Six, maybe most important, at least from our point of view. Neither of the two scenarios in the no action alternative represent a realistic, reasonable alternative to the proposed action. During the four years I have been working on nuclear waste, I haven't heard anyone seriously proposing either scenario.

10 The crucial question for the people in our county is: Are we better off having the waste shipped out as soon as possible or is it better to leave it on-site for an extended period of time? The answer to this question must depend on the risk to the general public and not on the financial interests of PG&E or any other plant operator.

11 Nobody can guarantee that an accident or terrorist attack is not going to happen. We know that a maximum severe credible accident will have terrifying and extremely costly consequences. The risk to the general public comes first and foremost from the extraordinary high radio -- radioactive content of the shipments.

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on page 2

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Obviously if the amount of radioactivity in the casks can be lowered, there will be proportionately less risk to the public.

For the first one hundred years after we move it from the reactor, most of the radioactivity and spent fuel actually comes from official products like Strontium 90 and Cesium 137. These are the major sources of radiological concern during transportation because they emit both beta and gamma radiation and other primary sources of exposure during routine operations. Most importantly, they're also the major potential source of irradiation and contamination in the event of an accident or terrorist attack. If we wait before transporting the spent fuel for at least one hundred years, much of the risk to the public will be avoided in the first place. In addition, we would gain time for ecological and scientific breakthroughs to come up with safer and better solutions for transportation and permanent storage.

Therefore, the Draft EIS must include not the totally unrealistic scenarios of the present no action alternative, but rather an evaluation of what we call a delayed action alternative. An assessment of at reactor storage options for up to 200 years before shipment to a permanent repository should also be included in a newly written Draft EIS. What are another 100 or 200 years in light of the 250,000 years the waste will have to be separated from the environment? |

MR. LAWSON: Thirty seconds, please.

MR. SCHUMANN: We had better get it right the first time. Thank you so much.