

RECEIVED

EIS000450

15 OCT 26 1999 MS. OWENS: My name is Janice Owens, and I'm
16 vice-president of consulting services for Edlow International
17 Company. More than 40 years Edlow International Company has
18 organized and managed international and domestic shipments of
19 all types of radioactive materials, including spent nuclear
20 fuel. I appreciate having the opportunity to comment on
21 DOE's Draft EIS for the Yucca Mountain, Nevada repository
22 project. This is a critically important step in the process

ESQUIRE DEPOSITION SERVICES

/

1 of evaluating the Yucca Mountain site and addressing a major
2 national energy policy issue.

3 I will focus my remarks on the issue of
4 spent fuel transportation. I believe it's important for
5 everyone to recognize that radioactive materials, including
6 spent fuel and high-level nuclear waste, are now being shipped
7 safely and routinely all over the world. Extraordinary
8 precautionary measures are applied to each and every
9 shipment, whether they are by air, rail, road or sea.

10 While there have been about 3,000 shipments
11 of spent fuel in the United States in the last 30 years, the
12 major spent fuel shipments in the U.S. today are coming from
13 foreign research reactors. Accepting spent fuel from foreign
14 research reactors is a key element of U.S. policy. With this
15 program, the U.S. has sought to minimize and eventually
16 eliminate the use of high energy uranium. Edlow
17 International Company managed first in 1963 and later
18 successfully managed more than 100 additional spent fuel
19 shipments.

20 When this program lapsed in 1988, Edlow led
21 the efforts to get the program reinstated, which took until
22 1994. During that period, Edlow participated in the

1 environment and other reviews that were undertaken to support
2 the initiative, Edlow continues to manage the foreign spent
3 fuel shipments into the United States. Concerns and issues
4 raised in the process of reinstating the foreign research
5 reactor spent fuel acceptance program are very similar to
6 those now being raised in conjunction with the possibility of
7 shipping fuel to Nevada.

1 continued

8 [While transporting commercial spent reactor
9 fuel as envisioned DOE's Draft EIS will, of course, be quite
10 different. I believe it's not only possible, but it's
11 essential we'll build on the successes and lessons learned
12 from the extensive nuclear materials transportation
13 experience base that exists today.]

14 According to data compiled by the
15 International Atomic Energy Agency, it's my understanding
16 that over the last 25 years on the order of 30,000 shipments
17 of spent fuel have been made. While the majority of these
18 shipments have been made within Europe, when the U.S. begins
19 moving spent fuel, the material will be safe. That is
20 already being shipped in Europe, and the containers used for
21 shipping will be designed in the same standards. [The safety
22 records for all shipments of spent nuclear fuel and other

1 continued

1 continued

1 radioactive materials is unparalleled. The primary reason
2 for the safety record is the rigorous regulatory standards
3 and controls that are applied on international as well as
4 national basis to all of these shipments.

5 Over the years, the series of international
6 regulatory standards for radioactive material shipments have
7 been developed. They -- the standards have been subjected to
8 extensive technical peer review by an array of international
9 experts. These international standards are periodically
10 reviewed and updated to reflect changing circumstances. Most
11 national regulatory authorities accept the international
12 radioactive materials to transport standards and integrate
13 them in whole or in part into the national regulatory regime.

1 continued

14 The important feature of all transport
15 regulations is reliance on robust and superior packages to
16 assure safety. All packages used in the transport of the
17 radioactivity materials must be designed and tested to
18 withstand all credible accidents. They must prevent leakage
19 of radioactive contents and provide shielding and
20 participation so that radioactivity is appropriately
21 contained inside the package in both normal and accident
22 conditions.

1 In the U.S., the Department of
2 Transportation and the Nuclear Regulatory Commission jointly
3 regulate all nuclear material shipments. The Department of 4
Transportation regulates the shippers and carriers of the
5 radioactive material and the conditions of transport, such as
6 routing, tie downs, vehicle requirements, handling and
7 storage. The NRC regulates the users of radioactive
8 materials in the design, construction, use, and maintenance of
9 shipping containers.

1 continued

10 In conclusion, a stringent international
11 regulatory framework for spent fuel transport is already in
12 place. There is extensive radioactive materials in spent
13 fuel transport experience. Some 30,000 shipments of spent
14 fuel have been made in the last 25 years by sea, road and
15 rail. The safety record is -- has been impeccable. Although
16 accidents have been reported, none have resulted in breached
17 containers or radiation releases.

18 MR. LAWSON: 30 seconds.

19 MS. OWENS: I'm not saying we should be
20 complaisant or cavalier about the large number of shipments.
21 What I would like to emphasize, there is adequate time to
22 plan and approve the extensive experience base in the

1 continued

1 international regulatory regime. NRC is now in the process
2 of reevaluating its piece. In addition, it's responding to a
3 petition from the State of Nevada to address the risk of
4 sabotage and terrorism. These are important activities, and
5 I believe they can lead to safe transportation of spent fuel
6 in the United States.] Thank you.

7 MR. LAWSON: Thank you very much. We will
8 take two more speakers now, and then we will take a short
9 break to give her a rest. Our next speaker will be Tom
10 Schatz and then will be followed by Steven Kraft. Is
11 Mr. Kraft here also? After Mr. Kraft, we will take a little
12 break. If you can speak over here.