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JAN 20 2000

Broschak

fabrication.

My responsibilities include the loading and operation of dry spent fuel casks at Consumers Energy's nuclear facilities. This technology is similar to that envisioned for the transportation and storage of spent fuel as part of the DOE spent fuel vagant program.

My first point: I work with this stuff. I don't study on talk of postulate. I do Unique perspective

Good Afternoon

My name is John Broschak and I am the Dry Fuel Program Manager for Consumers Energy in MI. I would like to offer my thanks for the opportunity to comment on the DEIS and spent fuel management issues particularly transportation. I'm also thankful to live in a country where individuals and groups are free to express their views on important issues such as we are discussing today.

I've spent my relatively short career involved in nearly all aspects of nuclear technology. I've operated nuclear power reactors on board submarines and safeguarded nuclear weapons in the defense of this great country. Over the past seven years, I've been involved with commercial nuclear power generation and particularly the management of the used nuclear fuel produced as a byproduct of that power generation. I have personally directed and supervised the loading of 432 spent fuel assemblies into dry storage casks currently in operation at the Palisades Nuclear Plant. And therefore, I am intimately familiar with the expectations and standards of performance for spent fuel storage and transportation management.

My father was a simple and hard working man who, interestingly enough, was originally destined to attend Parks Air College here in the St. Louis area at the beginning of the aviation industry. But life had different plans for him and he returned to

Pennsylvania to care for ailing parents. He ended up working his way through night school in order to pursue the vocation he loved — engineering. His primary goals in life were to instill solid values in his children and provide for their higher education. Two of the values my father instilled in me as a young boy were the concepts of being responsible for my actions and always doing my best. It's these two values I'd like to discuss in relation to the DEIS and spent fuel transportation.

1 The federal government is clearly responsible for management of the nations spent nuclear fuel. Courts have affirmed that responsibility on three occasions and thus responsibility is as it should be. The DEIS clearly confuses the feasibility, logic and common sense of storing this waste in a central, engineered location rather than at many separate, temporary sites. The cost issue alone is reason enough to support this conclusion — and imagine the cost and impact to this country if each individual had to manage their own waste — it simply doesn't make sense. The other area of responsibility I'd like to address is the responsibility we have for our own actions. This country has benefitted greatly from the power produced by nuclear generation, whether you are for or against nuclear power, the waste exists. It is irresponsible to not manage the safe and economical disposal of this waste. We owe this to our children and their children just as the country is addressing issues like Social Security and the Federal Debt. We need to be responsible for our actions and environmental issues.

The federal gov't mandated for this delivery in 1983 and

Next, I'd like to address the value of doing your
2 best. When it comes to spent fuel management, doing your best is not good enough. The consequences of error are too severe. I can tell you from direct experience that the DOT + NRC, the organizations that oversee nuclear waste storage and transportation, are demanding organizations that will not allow activities to occur if they do not meet the prescribed requirements. The fact that nearly 3000 ~~now~~ spent fuel shipments have occurred over the past 30 years, that's nearly 1 a day, without significant incident, is testimony to the stringent oversight of DOT + NRC. And ~~these shipment~~ these numbers don't account for the thousands and thousands of low level nuclear waste shipments that have occurred during the same time period and under similar requirements. Spent fuel ~~shipments~~ transportation will be performed correctly + safely, or it will not be performed at all.

3... I'd like to touch on an issue that is often cited as a failure of spent fuel management performance and NRC oversight. It is the issue of the flawed cask loaded + in operation at Palisades ~~under~~ during my tenure. Although we found + reported this ~~flaw~~ partial through wall flaw on a storage container, the NRC demanded that we demonstrate that the cask met all design conditions excluding the worst case postulated accidents. We were able to demonstrate that it did to the NRC's satisfaction

...3 and the cask has been in operation cooling and shielding the spent fuel since 1994 with no ~~increased~~ abnormal radiation ~~s~~, contamination or any other performance issues. If you don't believe my statement here, I invite anyone to come to MI to stand with me next to this flawed cask and observe for yourself the actual performance and review our historical record. The NRC demanded the cask meet requirements or it would not have been allowed to stay in operation. All future spent fuel storage and transportation activities must ~~be~~ and will meet the same type of standard or they will not be allowed to occur.

~~I would hope that this standard provides reassurance to the general public who may be affected by spent fuel transportation~~

In summary, my key points include that in my opinion,

- the ~~draft~~ DEIS confirms the feasibility, logic and common sense of disposing of this waste in a central engineered location.
- from my experience spent fuel transportation activities will be conducted safely and in accordance with ~~the~~ all other applicable requirements or DOT + NRC will not allow them to occur
- and finally, I believe we have a responsibility to ourselves and all future generations to take positive action to manage the nations spent nuclear fuel in a safe, and cost effective manner.

Many strong in favor a strongly opposed - express your opinion since our elected officials will ultimately decide the future course of action.

Thank You - GO RAMS!

Whatever outcome, I will continue to do my part to protect the health of ~~[illegible]~~ safety of the public