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Comments on DOE Draft EIS for Yucca Mountain

EIS001289

* Good Afternoon (Evening). My name is Vernon Higaki. I am the Supervisor of Emergency Planning for the Perry Nuclear Power Plant in Perry, Ohio. The plant is owned by FirstEnergy and is operated by its subsidiary, First Energy Nuclear Operating Company. The Perry Plant is located in Lake County about 35 miles east of Cleveland.

1 * I appreciate this opportunity to comment on the Department of Energy's Draft Environmental Impact Statement for the siting of a spent nuclear fuel and high-level nuclear waste repository in Yucca Mountain, Nevada. As the Draft EIS demonstrates, a single, centralized repository for the emplacement of these materials is the safest, most economic solution to permanent disposal rather than allowing such materials to remain isolated at 77 sites around the country.

✓ * As an emergency planning and preparedness professional and a life-time resident of Ohio, I am particularly aware of the need to carefully plan for the transport of spent fuel shipments through our state. The State of Ohio is an experienced participant in nuclear power plant Radiological Emergency Planning and has demonstrated their comprehensive planning and responsiveness during many federally evaluated exercises.

* The Ohio Emergency Management Agency has* also demonstrated its expertise to plan and coordinate rail or truck shipments of spent fuel through Ohio.

* During the 1990's, several spent fuel shipments safely passed through the State of Ohio. OEMA professionals were the primary state agency personnel responsible for

planning and coordinating these shipments so as to minimize the impact on the health and welfare of Ohio residents.

2 * Department of Energy shipments should be no different. As the Draft EIS states, DOE will be obligated to comply with NRC requirements for physical protection of spent fuel in transit. These NRC requirements are found in Title 10 of the Code of Federal Regulations Part 73 (73.37 and 73.72). They also must comply with the US Department of Transportation hazardous materials transportation requirements stated in Title 49 of the Code of Federal Regulations Part 172 (49 CFR 172.600). These requirements include providing Emergency Response Information to local, state and federal officials.

3 * Advance notification to State of Ohio officials will be a key component of DOE planning obligations. The NRC requires that its licensees and likewise the DOE provide 10 days advance notification of spent fuel shipments to State Governors or their designees along the proposed route, In Ohio's case, the OEMA would receive this notification. Ohio also has a law on its books that requires 48 hour advanced notification by shippers of such material to the OEMA whenever shipments are scheduled to pass through Ohio. The OEMA must, in turn, notify and coordinate such shipments with other responsible state agencies. While Ohio's law seems to exempt the federal government from its scope, we would expect DOE to voluntarily comply with Ohio's reasonable pre-notification requirements in its final national transportation plan.

* We believe that the mechanisms are well in place nationally and in Ohio to provide reasonable assurance to Ohio's residents that spent fuel shipments crossing this state can and will be safely accomplished. Thank you for this opportunity to

- 4 express my views and those of FirstEnergy. We encourage the Department of Energy to finalize this Environmental Impact Statement in accordance with its published timeline and keep this important process moving. Repository operation and Department of Energy acceptance of spent fuel must begin by 2010.