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TERRY LODGE:

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Thank you. I'm Terry Lodge, I live in the Toledo area. I am representing the Toledo Coalition for Safe Energy, which is a 25 year old organization opposed to the continued use of commercial
1 nuclear power. My comments fall into two -- well actually three areas. I think that the question and answer sections should be transcribed. I think that a record should be maintained of them. You're talking about getting expert statements and I believe that they may have some bearing on the ultimate decision.

2 A 1980 study by the Nuclear Regulatory Commission, and this 1980, 20 years ago, estimated the economic consequences in an urban area from a breach of a transportation cask at approximately $2 billion. A more recent study by the Department of Energy, or at least by the consultant for the DOE, estimated economic costs from a serious transportation accident on the order of $460 million, with a period of greater than a year necessary to clean up the residue.

You can talk about -- you can crunch numbers, you can talk about 10 million -- odds being one in 10 million of an accident happening. And I seem to remember similar kinds of nonsense and pablum made available to the public before Three Mile Island and yet there was a Three Mile Island.

Somebody observed a few years ago that 24 hours a day, 365 days a year, somebody in the nuclear power industry is doing the worst job of managing their reactor. I think the same type of precept when you're talking tens of thousands of transportations across the country, the same rule
3 will apply. The Draft EIS does not adequately address the possibility of saboteurs of terrorism, it doesn't adequately account for up to date technologies weaponry that can penetrate the casks which are, incidentally, nowhere near sound as Mr. William's makes them seem.

4 My last comment is that the Department of Energy has an inherent number of interests and should not be the lead agency on the development of a permanent repository. Let me give you one good example. I'm an attorney and I represent a number of clients in Michigan in a federal court action Pending in Kalamazoo U.S. District Court to stop a ridiculous experiment in the use of mixed oxide plutonium fuel in Canadian reactors. Part of the scheme involves the burning of about 34 tons of nuclear weapons, decommissioned weapons material, that has been converted into fuel in about half a dozen commercial nuclear power reactors in the south eastern United States. 34 tons of plutonium translates into several thousand tons of spent fuel, once that material is burned up in those reactors.

So, in effect, the Department of Energy is directly sponsoring and, in fact, has entered into contracts with several different utility companies to commence the burning of decommissioned nuclear weapons in American reactors to produce a far more radioactive material than otherwise exists in the form of decommissioned nuclear weapons grade material.

At present, if it weren't burned in reactors, that material could be immobilized in a ceramic glasseen type of fashion, could be far less expensively stored, could be far less expensively insulated and isolated from saboteurs, from anyone who might want to make the bomb or make

nuclear fuel out of it. Nonetheless, the Department of Energy is going ahead officially, formally and contractually to make high-level, heavily irradiated spent fuel, ultimately, out of it.

5 I have to concur with the earlier commentors who have said, "for God's sake, stop making more." Because we aren't going to be able to meaningfully talk about this problem until it stops expanding into even more of a problem.

I have one last observation and that is that the ark was built by amateurs, the Titanic was built by professionals.