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LOU DeBOTTARI: I want to finish my comments. I know they're boring but I want them in the record.

MR. FLAHERTY: You may also submit them in writing for the record. They count just as much.

1 LOU DeBOTTARI: Page 3-19, fifth paragraph, how much electrical energy will be needed to refine the titanium?

2 Page 3-19, section 3.2, the entire document assumes the TSPA has been approved as a model for evaluation. The specifications for the repository specific subsections that must be met. One in particular is the travel time for water to traverse through the mountain to the water table. DOE in the DEIS always uses an average time. The specification did not specify an average time.

Now, under the proposed method of assessment DOE has hidden the requirement. How does DOE square this report with the basic requirement that the natural barrier will be the first line of defense against escape of materials from the repository.

3 Now, on page 3-21, table 3-13, I'm not going to go through all the different ones. That will be in my written report. But one of them, the experimental corrosion data replaces expert judgment. That was the rationale on why the estimated effect would be the decrease in dose up to 10,000 years. And the reason for that was that they claim that there will be no failure of any cask for 10,000 years based on this new alloy that they've had about a year's worth of study on. This is a very interesting piece of data.

DOE has improved the waste package on paper and now admits the waste package will fail before the half life of plutonium is reached. The nonexistent natural barriers will be all that will be left after 10,000 years. Plutonium and the actinides with one half life of at least a million years might as well be buried in a hole in the ground.

This entire analysis depends on the very limited corrosion data of Alloy 22. There's conflicting data on the accuracy of this data. And a small variation will result in a significant decrease in the life of the engineered barrier.

4... Table 3-14, this table absolutely says there's no engineered barrier failure before 10,000 years. This is very optimistic and is based on a new magic bullet alloy. DOE wants the reader to believe that within one year the corrosion rates have decreased in either temperature scenario so as to have no failures. This is very suspect.

4 cont. The last line of the table indicates that the actinides have a half life of less than a million years. This is not true. All the waste packages have failed and I'd like to know what the controlling parameter was that made it only 800,000 years.

5 I'll make one more comment about what I think should be done. Rather than any specific way, I believe we need another Apollo program, a dedicated national interest that we spend 50 years with scientists from all over the world of different ages, both old and young, to come up with a solution for this waste, and make the decision now that whatever is done at the end of that 50-year period will be implemented so we won't go through this whole fiasco again of fighting about which is the best way.

But I think we need not a specialized interest group. I'd like to see a nonprofit corporation leading it. I don't want the TRWs and the Bechtels involved, the CEOs who want a bottom line. I want a nonprofit corporation. An example, an aerospace corporation, somebody who doesn't have to make a profit for the stockholders.

And I think if we put together a program like that and Congress gets behind it where they don't start putting in their technical expertise like they have on this waste package where they said you can't study anything where there's a grant, that to me was the Achilles heel of this whole deep geological repository. You couldn't study where they were granted, which is the best place to put a deep geological surface.

Thank you.