

**Bob Halstead, Executive Director,
State of Nevada, Agency for Nuclear Projects,
Comments to the Blue Ribbon Commission on America's Nuclear Future,
Washington, DC, December 2, 2011**

The State of Nevada applauds the Commission, and the Commission staff, for the process used in developing its Draft Report. In our opinion, the Commission and its staff have done an admirable job.

The State of Nevada strongly supports the BRC Draft Report recommendations regarding consent-based siting and waste program reorganization.

Regarding commingling of defense and commercial waste, we believe the critical implementation issues for a defense-only repository would be the same as for a commingled repository: consent-based siting and NRC licensing. We support the staff recommendation that any reexamination of the 1985 decision should be done independently of DOE.

We reiterate our October 2011 comments regarding transportation. The brief discussion of transportation issues in the BRC Draft (pages 53-55) does not adequately reflect lessons learned from the past 25 years of failed planning for transportation of spent nuclear fuel and high-level radioactive wastes to NWPA facilities.

Future spent nuclear fuel shipments will certainly be dramatically larger than current shipments. Both routine shipments and accidents will create the potential for radiation exposures to workers and members of the public, and for perceived risks in cases where actual radiation exposures are far below regulatory concern. Terrorism and sabotage will likely continue to be serious concerns.

We urge the Commission to expand its discussion of transportation issues into a separate chapter in the Final Report, and adopt the following recommendations:

1. The implementing entity should give equal consideration to transportation as it does for storage and disposal, as part of planning and designing the national nuclear waste management system.
2. The implementing agency should address transportation requirements for storage and disposal facilities, such as mainline rail access and interstate highway access in the earliest stages of site selection.
3. The implementing entity should adopt all of the NAS 2006 recommendations for transportation risk management; adoption of the NAS recommendations regarding full-scale cask testing and social impact management would be especially helpful for facility site selection efforts.
4. The implementing entity should follow the WIPP transportation model in developing a national transportation plan in cooperation with States, tribes, local governments, and state regional groups.
5. The implementing entity should insist upon full NRC regulation of all shipments to storage and disposal facilities.

In closing, let me again say for the record, that the State of Nevada opposes any further or future consideration of Yucca Mountain for nuclear waste disposal, storage, reprocessing, or any related activities. Thank you.