

November 1, 2008

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Dr. B. John Garrick and the rest
of the NWTRB members -

I sent a letter and 15 pages of comments on July 7, 2008. These were on your May 29 spring meeting transcript. Did you get this? I never got a response. (*William Barnard, NWTRB's Executive Director, called Ms. Shillinglaw on Monday, November 10 to respond to her inquiry.*) I don't even know how long the Board is going to exist or have oversight. What is your mandate for this and for a 2nd or 3rd repository? It is very clear to me and I have commented frequently to you about this concern, that this "aging facility" is interim storage (an MRS) and is illegal. As some of the speakers at the September meeting agree – this away from reactor storage meets utility objectives to be able to get the waste out of their backyard as soon as possible – even if the hot stuff goes on our rails 1st. They just want to smooth the way for new reactors by telling the public that they have "solved" the waste problem. I request once again that the board look carefully at this aging facility – the seismic concerns, the "tie down" (or whatever they are now using) testing – dose to worker levels, etc. The whole plan was to put the waste underground, not above ground in Nevada.

And I've referred to utility scheduling problems before. Now you see how it works – outages, refueling, problems at plants, worker schedules, temperature caps for use – etc., etc. - this will not be "easy" to get to work. These places are businesses in competition – don't ever forget that. And the proprietary stuff becomes a real problem. They don't want their outage dates in the public domain. Our VSC-24 at Pt. Beach had the temperature cap for moving in on the pad raises from the vendor's specifications. I remember testifying at a hearing in Madison - they said it was for "worker comfort" – but it was because of brittleness concerns in the cold. Everybody knew that's why it was changed. It was in the documents. That's the kind of stuff you'll see when we get to the "real thing".

And the requirements for retrieval and removal need to be very clear to the Board. DOE must clarify also how the testing for these capabilities will be done. Drip shields need to be evaluated now. They affect the whole system.

Look into dual purpose casks and their positions at the aging facility. Is this workable in the horizontal? How will upending affect the waste inside? The TAD allows all sorts of tipping and turning, yet nobody knows what's happening inside. I've repeated and repeated my concerns here.

There needs to be full scale testing of the real thing with a heated load. Even the VSC-24 testing did not reveal the hydrogen reaction because the real thing was only used

at the plant, after licensing. Make sure everything is tested properly – please! If alloy 22 at 25.4 M. thick needs quench testing, they need to do it!

You know Dave Zabransky and Bob Halstead go way back in our Wisconsin nuclear waste history.

I'm just afraid that the Board will not be able to get the documents they need after a certain point. When legal situations come up or plants and DOE disagree, they will shut you out, and back room decisions – for “the sake of the business” will be made – no matter how it affects the public. It happens – believe me.

The oldest waste should go away from the utilities 1st – common sense dictates this – for worker safety as well as for public safety - at utilities, on the rails in public routes, and at Nevada. They can't prove that higher doses than this plan of oldest first, as it was always meant to be, are necessary.

Well, I have a new grandson and the holidays are coming and I sort of see public impact on all of this fading. I'm so afraid the Board will just tire of all this work and just want it out of their lives. I don't blame you, but we need you to hang in there and keep asking the important questions.

I still think your thermal load and corrosion concerns are important, I'm so glad you are staying informed for the long haul, as now is when we find the “the devil is in the details”. Reality has surprises and believe me, there will be a lot of them. Plans on paper sound easy - it just will not be so.

This letter is my public comment on your Wednesday September 24th, 2008 meeting transcript from Las Vegas.

Thank you

Faun Shillinglaw