


**COALITION 21**

Supporting Tomorrow's Technologies With Facts, Not Fears

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83405

**Comments on Draft Environmental Impact Statement (EIS)**  
for  
**A Container System for the Management of Naval Spent Nuclear Fuel**

A Members of Coalition 21, a citizens' group promoting beneficial application of technology, have reviewed the subject Container System as it was presented by the Department of Navy in the public hearing at Fort Hall on June 3, 1996 and as it was presented in the Draft EIS. All six alternative approaches to the handling, storage, and transportation of Naval spent nuclear fuel appear to be fully safe and workable. However, the Multi-Purpose Canister (MPC) has advantages over the others that make it the superior approach. Packaging the fuel in a sealed (by welding) canister at the outset of handling the fuel minimizes any further decontamination labor required during transportation, temporary storage, additional transportation, and final storage of the fuel. Furthermore, the sealed canister would minimize the radiation to which workers handling the packaged fuel are exposed.

The Small MPC would have a similar advantage over the other four alternatives. However, use of the Large MPC alternative probably would result in lower total handling costs. Although the EIS is not required to assess operating costs (and the impact of a program on taxpayer dollars), Coalition 21 recognizes this concern.

B We recognize that selecting the MPC approach requires Waste Acceptance Criteria (WAC) for the Yucca Mountain repository. We encourage the Department of Energy to freeze the WAC before fuel actually is packaged.

C Coalition 21 compliments the Navy personnel who made the clear, forthright presentation at Fort Hall. The preparation of this Draft EIS indicates that the U.S. Navy takes seriously its commitments under the 1995 Settlement Agreement with the State of Idaho. The Draft EIS shows that the agreement is working.

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George A. Freund, Secretary

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Response to Comments:

- A. In Chapter 3, Section 3.8, Comparison of Alternatives, the EIS states that the impacts for most categories are small or nonexistent for all alternatives. Since 1957, the Navy has safely shipped over 660 containers of spent nuclear fuel from the shipyards and prototype sites to the Naval Reactors Facility. All of the shipments were made safely by rail and without release of radioactivity. Since any container alternative selected for dry storage and transportation (either by rail, heavy-haul truck, or a combination of both) must meet the requirements of 10 CFR Part 71, Packaging and Transportation of Radioactive Material, and 10 CFR Part 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Waste, other containers can also be used safely and reliably.
- B. In Chapter 3, Section 3.0, Description and Comparison of Alternatives, the EIS states that container system designs shall meet the technical requirements found in 10 CFR Part 72, 10 CFR Part 71, and 10 CFR Part 60 for storage, transportation, or disposal, respectively. The Navy agrees with the commenter that it is preferable for the waste acceptance criteria for repository disposal to be finalized before naval spent nuclear fuel is packaged. The Navy is actively participating with the Department of Energy in the process to finalize these and many other technical issues related to a geologic repository. In parallel with this effort, the Navy must move forward to meet its commitments made in the agreement with the State of Idaho, including removal of fuel from water pool storage. Thus, a container system must be selected, taking into consideration the waste acceptance and disposal requirements as they currently exist. Because there is a chance that any one of the container systems may require reloading prior to repository acceptance, the radiological releases due to unloading operations were evaluated as part of this EIS at both the Idaho National Engineering Laboratory and a repository. The results presented in Appendix A, Section A.2.4 show that the impacts on the environment are small for such operations.
- C. Comment noted.