



Nuclear Energy Information Service

Illinois' Nuclear Power Watchdog for 25 years

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COMMENTS OF NEIS ON THE DOE GNEP PEIS February 22, 2007 Joliet, Illinois

My name is David A. Kraft, Director of Nuclear Energy Information Service of Chicago, Illinois. Our organization represents a membership of nearly 800, the majority of whom live in Illinois. We thank the DOE for the opportunity to present our views concerning what should be addressed in a Public Environmental Impact Statement relating to the Global Nuclear Energy Partnership (GNEP). Submission of these comments and participation in these proceedings should in no way be construed as NEIS' endorsement of the GNEP – a program which we adamantly oppose.

While more detailed written comments will be submitted before the April 4th deadline, NEIS wishes to make sure that the following items are addressed and resolved before any approval of a GNEP facility is granted for Illinois, where those comments relating to Illinois apply; or for any other location where they are more generic and policy-oriented:

LOCAL/ENVIRONMENTAL:

- increased threat from accidents and terrorist attacks; the GE Morris Operation and Argonne sites are only 10 minutes flight time from the world's busiest airport at O'Hare Field -- of great significance in a post-9/11 world;
- a site and facility-specific analysis – not a generic evaluation or study -- of the ability of the buildings and structures actually proposed for construction that will house radioactive isotopes to withstand the impact of an airline crash from today's and future vintage commercial and military aircraft;
- makes Illinois a de facto permanent HLRW storage depot and reprocessing center for the region and possibly the nation (given how Congress works; also the National Energy Policy of 2005 gives DOE some pre-eminent powers to site regional waste holding facilities in the absence of a permanent deep-geological perpetual storage facility even over the objections of local governors and mayors; and pre-empts ANY state or local laws on the matter. Governor Blagojevich signed a letter with 16 other governors in opposition to this plan last November.)
- current inadequacies of the emergency response community to handle the expected increases in transport accidents involving spent fuel or the new types of wastes created by reprocessing, most of which (fission products) are shorter lived and much more intensely radioactive than Plutonium or Uranium
- the adequacy of the road/rail network in the area to safely handle the increased traffic of "mobile Chernobyls" shipments required by such a facility.
- the cost of escort services pledged by the former Illinois Department of Nuclear Safety for every HLRW shipment into-through-out of Illinois; who will pick up the costs for these escorts?
- potential effects on ground and surface waters, and on local wells, from such a facility.
- effects of recent seismic activity in the Morris area (the earthquake of 2003 may have done damage at the Dresden nuke; what would it have done at a reprocessing facility?)
- consideration of the locations in relation to the 100 year flood plain in the area; and a future-looking analysis of regional climatological effects anticipated from Global Warming on the functioning, safe operation and security of these facilities.
- effects on the local economy in terms of traffic disruptions; stigma of radioactive contamination of local agricultural products; effects on current and future property values as a result of normal operation and in case of an accident at any proposed facility.

NATIONAL/POLICY CONSIDERATIONS:

NEIS holds the following policy concerns about the GNEP proposal generally, and wants the DOE to examine and explicitly respond to the specific local effects any and all of these concerns might have:

- reprocessing is really nothing more than a policy mask, a Trojan Horse disguise for the continuation or expansion of a nuclear weapons intent and infrastructure (see below); it has failed three times previously in the U.S. Why should the public, especially in Illinois – the most nuclear reliant state in the US -- have any faith that DOE can

make it succeed on the fourth try, especially after the miserable track record and failure of DOE to open the nation's deep-geological HLRW repository on schedule? Why should DOE be trusted with an additional \$200 million in funding for programs and technologies that have yet to even be designed and demonstrated?

- What safety advantage is afforded Illinois or any other community by DOE's decision to side-step demonstration model technology, and proceed immediately to commercial scale facilities with untested technology? Isn't this what caused so many generic safety problems to be inadvertently built into today's generation of nuclear power reactors? Didn't the first GE Morris Operation reprocessing technology also fail because of design problems?
- This is another example of US foreign policy hypocrisy: "Don't do as we do, Iran - do as we say!" It erodes our credibility and prestige in foreign affairs. How does DOE reconcile the double-standard of this position on reprocessing? How do the effects of this double-standard make Illinois a safer place?
- GNEP increases the likelihood of nuclear materials proliferation and nuclear terrorism; it makes it EASIER for terrorists to actually get at and divert the kinds of materials they would not have access too in normal irradiated-spent fuel elements, for use locally as dirty bombs or diverted elsewhere for potential manufacture of small nuclear devices.
- The only nuclear engineer we ever had as a U.S. President -- Jimmy Carter -- discontinued reprocessing fearing it would make worse nuclear proliferation internationally. History has proven him correct (see below). His expertise and credentials in this arena far exceed those of the current President.
- The MIT 2003 report on the future of nuclear power specifically rejected reprocessing, advocated a "once through" fuel cycle, and advocated deep geological repository disposal of irradiated reactor fuel. What does DOE know that the MIT doesn't?
- GNEP diverts resources from and lessens political pressure to complete a deep-geological repository like that proposed for Yucca Mt.; to what extent will DOE have insufficient internal resources – staff, time, sub-contractors, funds – to simultaneously proceed with deep-geological repository work and the final siting of such GNEP facilities?
- Historically, reprocessing of spent nuclear fuel from commercial reactors has led to the desire for or actual construction of nuclear weapons programs in India/Pakistan, China/Taiwan, and South Africa. And now the "newbies": North Korea, and Iran. How will this be any different with GNEP?

We thank you for your consideration of these views, and look forward to your timely and written response to all of our concerns.

Gratefully,

David A. Kraft
Director