Nov. 19, 2010 1952 Palisades Dr. Appleton, WI 54915

To: U.S. NWTRB – Public comment on transcript of fall meeting of Oct. 26, 2010, at Dulles Airport Marriott

I drove past the dry cask storage site at our Pt. Beach plant in Wis. last week. The trees they planted around it hide it well now after all these years. I remember when the pad was 1st. built and I was there looking at it; when down the road came the brand new transporter vehicle hauling an empty cask for a trial run. We of the public had only seen this thing as a "concept" of a few sticks on wheels in a video of what was to happen at the plant (if our public service commission gave it the "go ahead" after our public hearings). They gave me permission to watch, and I questioned one of the men as to where the waste would eventually go? He said he wouldn't be around then – which was a man answer. The transporter had trouble turning onto the road into the fenced pad – they had to throw sand on the road for some reason. I wondered if this thing had ever been tested on used any where before at all! Now, I'm thinking about how many casks of different designs are already on that pad? Any idea? Well I know the original VSC-24's were for storage only. Then I think some dual purpose cask was used later. But as people at your meeting discussed, TAD's were never really (p.2 of 5) designed, prototyped or tested as far as I know. So, you need to go back to what is at the plants now and what will be going there soon --- this is the crux of the problem. The plants, because of the lawsuit, have not played a major role and won't either. They want what is cheapest for them. Now that TAD's are on hold, they will continue to purchase the "best deal" and the lack of integration and standarding action grows worse and worse in the total waste systems.

July Treichel said the major questions – is the repository to allow more waste to be created? If this country says "no" to <u>more</u> waste creation, then I think you will find a public you can work with. If more and more waste is created, and a 2^{nd} surely, maybe a 3^{rd} , etc. repository is needed – I doubt you will ever site even one.

I was glad to hear of the welding demonstration as I've always felt the weld material and process is the "Achilles heel" of the whole system. And as the fellow from Germany said, "you never demonstrate anything". Dr. Duquette admitted it was the truth (p168). The system to place the waste in the repository, the <u>retrieval</u> system, the drip shields, etc. were never fully evaluated or explained to the public. The answer to the Cholorine 36 flow never solved. The "materials problems" never fully examined. One asks, was Yucca Mt. a failure because of political or (<u>p 3 of 5</u>) scientific concerns? Both I'd say. And new concerns with future climate changes have remained a challenge unanswerable.

This meeting was needed so badly and I thank the Board for saying, "lets take a look at what happened – lets get advice from every body involved – let's hear from other countries". The Board has continued to keep on track with Congress and ask the tough questions. It's never

too late to admit a mistake and Yucca Mt. was a big one and very costly in hard economic times. But the waste problems loom ahead in the future. And if industry tries to ram a license through NRC in a change of administration, you will see more and more challenges. There was a hint of going to the Native Americans land again which just appalls me as "environmental racism" (no matter how much a tribe gets in payment) and I know Wisconsin will rally again against any site in granite here in the Wolf River Batholiths.

As I see it, you have to take a good look at the aging, condition, and numbers of the casks on the pads, and to be put there in the future. Look at the specifics. Is it even feasible to transport aged fuel? I go back to my old "can of peaches" argument. If you don't check what's in the can, how do you know they aren't rotten, before you put them on our rails and roads? Spent fuel and first the cladding and other materials (p.4 of 5) in dry cask storage and still full of a lot of unknowns. And the nuclear plants and industry are not for the coming with information. "Just take it away so we can make more waste nobody wants", seems to be their attitude. Well, these pads are getting full, monitoring will be more and more difficult, retrieval or changing casks will be harder to do as time goes on. And terrorism in the future is a real concern.

I have great faith in the Board as human beings using their technical expertise to solve this problem, or at least listen and ask the right questions. Please be honest with yourselves as it concerns a big point in the history of this country in the future.

I think your next meeting should be about dry cask storage at the plants and aging pools. What is really the situation? The costs? The problems? What is really on the pads and coming in the future? At what point does transport and underground storage become no longer possible at all? Can we hear of alternative solutions? Can renewable be considered? If you were to discuss halting creation of more radioactive waste, do you think the public would help with a solution more readily? Certainly truth and honesty has to be part of any future plan.

Thanks for listening, Fawn Shillinglaw

Is a repository		Sat. Nov. 20, 2010
really the answer?		
I don't think so.	Page $5 - (addition \text{ to my comments})$	

P.S. I am up early this morning, as usual, and a giant moon is visible going down through the trees across the river – it makes me feel that I and this earth are <u>very small</u>. And while doing my exercises in the dark I am thinking about nuclear waste, instead of going to see my grandchildren in a few hours. All these years – and how hard I worked when I was really "into" all this, when the casks were to be put on Pt Beach – all the years of following the documents at the library and the research on what NRC was doing in the 1^{st} generic certification of dry cask designs.

And now – here we are at a new beginning again and I contemplate the situation. As we all said then – "the waste will never leave this site along Lake Michigan if we allow this." Well, it was done, and there it sits. I guess I've always felt it was much better <u>above</u> ground where we could monitor it. Everything people <u>bury</u> as waste has unexpected complications as time goes on

- (look at buried gas & oil tanks, etc.) So, I think, now the best thing to do is a careful, through, assessment of what is <u>really</u> there now. I'd like the Board to evaluate the lemons and see if we can't make lemonade! We have to know what kind of casks, plans for changing them, monitoring them, etc. Why couldn't they stay put? I don't think any body has evaluated what are all the ramifications. It should be done now. Fawn Shillinglaw