Follow-up on the June 24 presentation……July 24, 2015

Hi Dan,
I thought I would let you know that I am considering a larger framework for my June 24 arguments--a set of questions to be addressed in a public process by a group with the appropriate range expertise and insight, arriving at well-considered findings and recommendations. On their face, the questions are straightforward:

1. Should SNF be removed for interim storage?
2. If removed, should it be removed to a single location (particularly one that provides prospective disposal media);
3. If removed to more than one, to how many, based on what criteria?
4. Is a greater sense of shared responsibility possible in this program, or not?

Actually, of course, the questions are not so very easy. On each, there are plentiful views and positions, but insufficient systematic interdisciplinary thinking. With well-considered findings and recommendations on these questions—even if not yet converted into settled policy--I feel the whole program could be much more coherent.

Also, I've reviewed Scott Field's nice transcript of the June 24 proceedings, and have observed with contrition that I partly misunderstood and/or was not well prepared for several of the Board's questions. I appreciate the questions. Since they touch on my current proposal-under-development, I thought I might formulate my current responses:

PEDDICORD raised the comparison with Navy SNF shipment. (Others raised comparisons with Baaken crude, foreign research reactor SNF, shipment in France, etc.)…….My point is that, in each case, there are 4-5 key distinctions with prospective SNF shipment in the U.S., and that we haven't really considered or learned much from the comparisons. A group with appropriate expertise-insight should carefully review each comparison to identify useful lessons, caveats, and concerns. Equally with technical factors (e.g. maximum allowable gross weight limits) the results should be factors in program design.

BRANTLEY raised a "central conundrum" in my presentation: On the one hand, federal documentation (of technical safety) won't be trusted by many stakeholders. On the other hand, stakeholder processes (e.g. the SRGs) have difficulty generating appropriate engagement……..I agree that current stakeholder engagement processes have significant limitations—in part because credible action seems so uncertain and distant, in part because processes focused on routing and operations avoid the levels of integrated transportation planning at which most impacts are determined, in part because SRG membership (mainly state agency managers) cannot fully represent the perspectives of diverse corridor communities…….. However, I would revise Brantley's formulation: The key purpose of stakeholder engagement should not be to persuade stakeholders to trust federal documentation of technical safety. Even if such documentation warrants substantial trust, corridor communities have other legitimate concerns. These concerns should be identified and addressed during program design, in the context of the four questions noted previously. Adequate attention to the four questions and their embedded (technical and non-technical) concerns requires something other well beyond the current SRG process—an appropriately authorized group with expertise and insight in systems analysis, siting, risk perception, SNF transport. As for FRAM oil filters, the program can address the concerns now or address them later. To address the concerns now requires expertise and insight not currently engaged, and may produce inevitably tentative findings and recommendations. To address the concerns later, after key program decisions (e.g. siting) are made, precludes the better options for addressing this constituency, which under certain foreseeable circumstances

could affect the program drastically. Neither option is perfect, but the first seems clearly preferable.

EWING raised the very good question, how might the DOE "system oriented tools" (mentioned by M. Bates in the previous session) incorporate or inform the issues that I was trying to raise. My June 24 response focused on my three-year frustration in trying to learn more about these tools—their basic structure, their key variables and calibration, their intermediate and "bottom-line" results, their application in policy choices……..My broader concern, however, is that these tools seem to be developed for internal purposes only. They have no external user—no group equipped to probe, inquire, critique, suggest and follow-up. Now, four years into the systems development process, I think the need for a "external user" (which could begin with my first three questions in mind) is fairly urgent.

FOUFOULA asked how to convince a potentially large number of local communities that what is not so good for them is nevertheless good for the nation as a whole…….I think the answer is in a program design that considers my first three questions, and that, in process, takes these (mostly legitimate) local concerns into account. At the moment, I feel that transportation is treated as a free variable in program design……"any amount, affecting any number should be OK, as long as we demonstrate technical safety". To the contrary, I think that the concerns of corridor communities (including those not related to technical safety) should be a *factor* in program design--the program should have a clear explanation why it is necessary to impose on these communities for certain immediate program purposes. With such explanation, I think local communities can be dealt with directly and straightforwardly. Otherwise, implementation may involve coercion and indirection, and risks substantially greater contention, delay, even failure.

EINZIGER asserted that, until a decision is made on final disposition, large uncertainties in any analysis are inevitable. I should start with potential repository locations and work back, rather than start with the current situation and work forward towards inevitably uncertain disposal……Bob implies that large-scale storage in the vicinity of a prospective disposal site (e.g. in west Texas or southeast New Mexico) might be desirable because—if the disposal site were characterized and licensed—no (or very little) additional transport would be required. This appears to be the program's current "path of least resistance", and it would and should be a key issue under my question #2. My counter is that, if one believes in consent-based siting, one must take scrupulous care that the siting of interim storage does not prejudice the siting of disposal. Large-scale storage, particularly in the vicinity of a potential disposal media, would severely prejudice repository siting—towards any site in the vicinity, and away from any and all other potential repository media.

Best, JimWms