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September 21, 2001

Mr. Lake Barrett
Acting Director
Office of Civilian Radioactive Waste Management
Department of Energy
Washington, DC 20585

Comments on the recommendation of Yucca Mountain as a repository for spent nuclear fuel and High Level Waste

Dear Mr. Barrett:

PSEG Nuclear LLC, operator of the Salem and Hope Creek Nuclear Generating Stations, Lower Alloways Creek, NJ, offers the following comments on the Secretary of Energy's recommendation to President Bush on the suitability of Yucca Mountain as a spent fuel repository.

After review of the extensive documentation and work product over the last 20 years, it is clear that your decision to support the recommendation is based upon sound scientific facts and analysis that show this repository will meet the appropriate requirements. After \$7 billion dollars in studies, there are no technical or scientific issues that will prevent Yucca Mountain from serving as a permanent repository.

As a nuclear generator who understands the nuclear safety culture, and can look back upon our own history of achievement, we have confidence that this facility will be safe and will meet the conservative requirements set forth by the regulators. The proposed criteria as defined in 10 CFR Part 963 are comprehensive and appropriate. Even though the regulation containing the criteria is still in its final stages of approval and not yet issued, the proposed criteria are the most appropriate to use since they are based upon current standards. These criteria will ensure that the site meets the public safety and environmental requirements.

Mr. Lake Barrett

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We have confidence that the Nuclear Regulatory Commission's licensing process will ensure a safe design and operation of the facility. This process will guarantee the best science is applied in the design of the facility in a manner that will ensure public health and safety and protect the environment. Since public health and safety standards for Yucca Mountain must be based on sound science, controversy over standards that lack scientific basis, as previously proposed, should not be permitted to stand in the way of a decision.

This recommendation is consistent with that of the National Academy of Sciences, which concluded that geologic disposal is the only scientifically and technically credible long-term solution. The recommendation to the President is based upon reliable scientific methods and is an integral part of an environmentally responsible energy policy that recognizes the emissions-free nature of nuclear power.

Finally, it should be noted that DOE's non-performance on establishing a repository has resulted in a significant financial impact on the utility industry. It is incumbent on DOE to move toward movement of used fuel from nuclear facilities around the country.

Sincerely,

