

EIS000205

**Physicians for Social Responsibility**  
**Comments on the Yucca Mountain Draft Environmental**  
**Impact Statement**

(DOE/EIS)  
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Physicians for Social Responsibility (PSR) is a national organization of approximately 20,000 members. We are the United States affiliate of the International Physicians for the Prevention of Nuclear War (IPPNW), recipients of the 1985 Nobel Peace Prize. We are dismayed with the DOE's rushed plan to transport nuclear wastes across the country to a final destination that is flawed as a permanent waste repository.

1.) We feel the DEIS underestimates the dangers associated with storing an unprecedented amount of highly radioactive waste at Yucca Mountain.

This site should be disqualified from consideration because of key flaws that make it an unsafe option. The DEIS states that we can expect no significant contaminant releases into the air or ground water, but seismologists have confirmed that earthquake activity will cause walls to crack and wastes to leak into groundwater and contaminate the air. Yucca Mountain and surrounding areas have experienced nearly 600 earthquakes in the past 20 years, and we can expect continued seismologic activity. Experts have also concluded that groundwater passes through this region at a rapid rate, meaning that if a leak occurs, contaminants could be quickly taken up and carried long distances.  

2.) The DEIS does not note that waste repository release limits at Yucca Mountain would

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be much higher than the accepted standards set by the EPA. If the EPA had remained as the standard setter in this agreement, the Yucca Mountain site would indeed be disqualified. The plans for Yucca Mountain have been allowed to proceed only because Congress has agreed to more and more relaxed health and safety standards. We believe that the EPA should set the standards for radiation releases, and that groundwater at this site should be subjected to safe drinking water standards established by the EPA. ]

3 [ We also note the inconsistencies that appear when you compare health and safety standards for the Yucca Mountain site with those outlined for the Waste Isolation Pilot Project. The NRC proposes radiation release rates of 25 millirem/year for Yucca Mountain as compared to a slightly better EPA standard of 15 millirem/year for WIPP. At WIPP groundwater samples are to be taken 5 kms outside the site, while the Yucca Mountain measurements would be gathered from 20 kms away. The WIPP site currently has a groundwater standard of 4 millirems, while Yucca has none. PSR believes that Nevada residents deserve the same level of protection granted to residents of New Mexico and that everyone has the right to clean air and safe drinking water. ]

4 3.) [ **The DEIS underestimates the dangers associated with transporting these wastes all across the country.**

This is by far the largest nuclear waste transportation project ever, yet the plans contain too many unknowns for it to be fully safe. We do not yet know how this waste will react, nor do we know enough about the containers in which it will be shipped, which have yet to be constructed or subjected to testing. There is no basis for DEIS assertion regarding the amount of radiation that

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could leak from containers in transport or how serious leaks could become in the case of an accident. ]

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[ Roughly 50,000 truck shipments will ultimately travel through 43 states past million of peoples over the lifetime of the project. Accidents will happen, and we cannot be sure that communities will be prepared to respond when they do. The DEIS does not sufficiently discuss the proposed shipping routes or the training and equipment necessary for emergency response personnel in communities along the route. This information is an essential part of determining the safety of the shipments. ]

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**Our Prescription--** [The DEIS concedes that there would be fewer deaths and injuries if the DOE allowed waste to remain at the existing power plants and storage sites, yet there is still a push to send the waste to Yucca Mountain. We ask the DOE to put health and safety above industry profit by stopping this premature decision to truck wastes to the Yucca Mountain repository. Yucca Mountain should be removed from consideration as a permanent repository, and waste should be stored at the site of origin until a safe permanent site and transportation proposal are confirmed. ]

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