



EIS000225

STANDING FOR TRUTH ABOUT RADIATION

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Site Characterization Office,
Office of Civilian Radioactive Waste Management,
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Re: Yucca Mountain Draft Environmental Impact Statement

The following are the comments of STAR (Standing for Truth About Radiation). STAR is a non-profit organization membership organization concerned about the toxic effects of nuclear radiation in particular and at Brookhaven National Laboratory and the Millstone Nuclear Power station in particular. STAR promotes public awareness, medical and scientific investigation, institutional accountability, independent oversight and responsible public health and environmental policy.

1) Western Shoshone:

1 Yucca Mountain -- also known as "Serpent Swimming West" by the Western Shoshone People -- is sacred land. The Western Shoshone People have a treaty that the U.S. federal government will not honor. They reject the dumping of the nation's nuclear waste on their land. This must be acknowledged and considered.

2) Groundwater:

2... The data that DOE has collected about this Mountain show that it is not capable of isolating nuclear waste. The little tube around the fuel rod does more the isolate the tremendous radioactivity of this waste -- more than 95% of the radiation produced by the Nuclear Age -- than Yucca Mountain itself will do. It is clear that once the containers start to leak, radioactivity will reach the ground water in decades or at best a century or two, not the tens of thousands of years that are needed to protect the Earth.

2 cont. Geologist Jerry Szymanski, who consults for the Nevada attorney general's office, submitted written comments restating his stance that the draft document is flawed because it is wrongly based on a conclusion that thermal waters have not risen historically from below the mountain.

In fact, he said there is now more evidence from minerals taken from an exploratory tunnel in the mountain that back up his controversial theory that the minerals were formed by upwelling water and not deposited by rainwater that traveled down from the mountain's surface.

If thermal water rises from below and reaches what would be the repository floor, the result would be catastrophic because waste canisters would corrode rapidly, contaminating ground water and creating radioactive steam that would spew from the mountain.

For example, the report "trivially understates the radiological consequences of a catastrophic breach of the proposed repository by geothermal waters," he said, explaining this could be triggered by earthquakes or volcanic events. These concerns must be addressed.

3) Transportation:

3 The original environmental analysis for a nuclear waste repository at Yucca Mountain said that the radiological impact from nuclear waste transportation would "not be significant"...only later did a DOE staffer admit that the way that statement was arrived at is that they took the number of people that they project would be injured by a nuclear waste shipping accident --even a pretty bad one -- and average them across the entire US population. It is after all, a national program. Contaminating half of Indianapolis becomes "insignificant" when averaged across the entire nation and over a 30 year period. This is not acceptable.

4 Each large rail cask will carry the radiological equivalent of 200 Hiroshima bombs -- when comparing the persistent radioactivity in each. The numbers given on the projected maps on the Nevada website are low. They do not include all the defense waste shipments that would travel from Savannah River Site SC, Los Alamos and Sandia in NM, INEEL in ID and Hanford in WA, as well as the West Valley site in NY. They also assume that rail is used wherever possible, and yet a rail cask hold 5 times more than a truck cask. So, if trucks are used more than the original projection, some numbers of shipments go up bay a factor of 5. The number of shipments total could approach 100,000.

7 Furthermore, there is no real training program in place to help local emergency responders and planners.

4) Cumulative impacts:

5 The document fails to address the broad scope of impacts on the 1,500 people who live spread over 200 square miles in the area. There needs to be further examination of cumulative impacts such as existing subsurface contamination at the nearby Nevada Test Site, disposal of low-level radioactive waste in the county and other federal uses of land by such agencies as the Defense Department, the U.S. Forest Service and the Bureau of Land Management.

6 [Nye County consultant Thomas Buqo and Steve Frishman, a consulting geologist with the State Nuclear Projects Agency, questioned calculations by Yucca Mountain Project scientists that show the radioactive inventory after 1,000 years of waste storage would be 120 million curies, or units of radioactivity. That amount is less than half the current burden of 300 million curies left from below-ground nuclear tests at the Nevada Test Site. Frishman said the Yucca Mountain inventory would be at least 4 billion curies after 1,000 years of decay, potentially adding more contamination to ground water supplies in Nye County than from what exists now as a result of full-scale U.S. nuclear weapons.] Such testing was put on hold in 1992.

Respectfully submitted,



Scott Cullen
Counsel