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JAN 06 2000

EIS000526

January 1, 2000

Ms. Wendy Dixon
M/S 010
U.S. Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
PO Box 30307
North Las Vegas, NV 89036-0307

Subject: Draft Environmental Impact Statement (EIS) for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada.

Dear Ms Dixon:

Thank you for the opportunity to review and comment on the above referenced EIS.

The forward of the EIS (page vi) states "...the EIS analyzes the potential impacts of transporting spent nuclear fuel and high-level radioactive waste to the Yucca Mountain site from 77 sites across the United States." (emphasis added) Figure 1-1 on page 1-2 of the EIS identifies the sites from which such spent fuel and wastes will originate, four of those sites are in California. Section 2.1.3.2 of the EIS identifies the modes of transportation and routes to be used for the transport of the spent nuclear fuel and high-level radioactive waste. As identified in this section, the Department of Energy (DOE) would ship these materials to the Yucca Mountain site by some combination of legal-weight truck, rail, heavy haul truck and possibly barge. Based upon Figures 2-26 and 2-27, the DOE intends to use the Union Pacific coastal railroad which passes through my community (as well as many other coastal communities) and a combination of highway routes including Highway 5 among others.

- 1 [I have reviewed Section 6 of the EIS which addresses the issue of "Environmental Impacts of Transportation", including incidents from accident-free transportation as well as impacts from accidents. The text (page 6-30) states that the assessment of transportation accident scenarios was evaluated by using state-specific accident data among other factors and references the reader to Appendix J. Upon review of Appendix J, the state-specific data is not presented. Therefore, the reader has no way of determining the accuracy of this information. Please provide this information.]
- 2 Additionally, [the risk assessment does not provide a risk evaluation by state or region, so I for one do not know what the estimated risk to my community is. Furthermore, the maximum reasonably foreseeable accident scenario for the mostly rail transportation scenario assumes that the maximally exposed individual would be 1,180 feet from the accident. In our area, housing and other occupied land uses are located adjacent to the railroad right-of-way; thereby placing individuals much closer than 1,180 feet from the potential accident site. The transportation risk analysis should be revised to present reasonable worst case scenarios that more accurately depict conditions by region.]

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[Another factor that is not considered in the accident scenario evaluation is the potential impact of released radioactive materials on the natural environment. In our area, the railroad travels through, over and in proximity to sensitive habitats including wetlands and the ocean among others. Please revise the EIS to include such evaluations.]

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[I am also concerned about the long-term safety of the Yucca Mountain site. Page 2-37 of the EIS states "DOE would use institutional controls, including land records and warning systems, to limit or prevent intentional and unintentional activities in and around the closed repository." It is my understanding, for example, that: Plutonium-239, an irradiated fuel, has a half-life of 24,400 years and that it remains dangerous for a quarter million years, or 12,000 human generations. Furthermore, as it decays, uranium-235 is generated which has a half-life of 710,000 years. Thus, the hazard of irradiated fuel will continue for millions of years. Therefore, this material must be isolated from contaminating or irradiating living things for this long. Considering the evidence provided by all of the known history of civilization, does the DOE expect the political stability of this country (which is only one issue pertaining to the long-term safe disposition of this material) to have a duration that would even remotely approach that necessary to ensure the continued application of "institutional controls" for safe disposal of this material?]

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[The bottom line as I see it, is that there is no known, feasible, safe way to dispose of high-level atomic waste. The real solution is to stop making it. Forty years ago, when the commercial nuclear power program started in the U.S., nuclear scientists admitted they didn't know what to do with the waste, but said it wouldn't be a problem. This does not appear to be the case. The creation of nuclear waste is illogical for a society that is concerned with the health of its people and the environment. Nuclear development was a mistake. However, we could prevent exacerbation of this foul situation by closing reactors at the earliest practical opportunity and promoting energy efficiency, efficient natural gas turbines, and renewable energy sources such as wind and solar power. Furthermore, we should encourage other nations to do the same, and discourage those who would seek to open this nuclear Pandora's box. The old adage "an ounce of prevention is worth a pound of cure" applies here.]

By the way, "Native Americans" are not the only people concerned with the sacred nature of our environment. As a regular old American of European heritage, I too consider our environment sacred. The earth is indeed our mother/father. The health of the earth and its biota is intricately entwined with ours. For any decision-makers out there that may happen to read this letter, I hope that you understand this too.

Sincerely,



Donna M. Hebert

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