

6 NOV 09 1999 MR. WISSBECK: Thanks for the opportunity to
7 address the Department of Energy regarding the Draft
8 Environmental Impact on the nuclear repository at Yucca
9 Mountain.

10 My name is Larry Wissbeck. I reside at 101
11 Clover Street, Caliente. My mailing address is post office box
12 156 Caliente, Nevada 89008.

13 I would like to direct my comments to the
14 transportation section of the Draft Environmental Impact
15 Statement, pages J-1 through J-119. My first observation is
16 rather general.

17 [The Draft Environmental Impact Statement is an
18 extremely unusual DEIS because it is limited by the Nuclear
19 Waste Policy Act to consider only Yucca Mountain as the site
20 for the nation's nuclear waste repository.

21 The Congress has forbidden you from considering a
22 better alternative to a site that is porous, on an earthquake
23 fault -- several of them actually -- and certain to leak deadly
24 poisons into the groundwater outside the boundaries of the
25 repository.

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1 cont'd.

1 I'm sure you have been embarrassed as you were
2 forces to apply Band-Aid after Band-Aid in an attempt to
3 overcome the obvious flaws of the Yucca Mountain site as
4 presented.

2 5 [One area where the politicians have not tied your
6 hands is in the safe transportation of deadly nuclear waste to
7 wherever it is to be deposited.

8 Yet the transportation section of the
9 Environmental Impact Statement shows very little scientific
10 thinking or thinking of any sort about how this deadly cargo
11 might be safely transported.

12 Section J-2 of the DEIS says you will transport
13 the nuclear waste by some sort of truck over some sort of road
14 system or perhaps by rail over some sort of rail system or
15 perhaps by some combination thereof.

16 A major flaw in this transportation plan is that
17 the DEIS locks in the transportation of nuclear waste to these
18 limited methods.

19 Once the DEIS is approved, progress on the safe
20 transportation of nuclear material stops.

21 It could -- if it could be proven, and it
22 probably can, that shipment by air is less risky than by rail
23 or truck, the Department of Energy need not and perhaps cannot
24 consider this option.

25 Likewise, any new transportation technology,

2 cont'd.

1 either in the pipeline or developed after the DEIS approval,
2 need not be considered.

3 The listed transportation options also discourage
4 further scientific thinking about transportation, much the same
5 as the selection of Yucca Mountain as all further consideration
6 and safer alternatives.

7 Section J-1.2.1 of the DEIS says on the one hand
8 that the DOE cannot accurately predict a mix of rail and truck
9 transportation ten years in advance of the projected start of
10 the transportation project.

11 On the other hand, the DOE is perfectly willing
12 to limit the option -- options to truck and rail with no
13 necessity for a re-examination of options and environmental
14 impacts that will exist ten years hence.]

15 I had some specific observations on the
16 transportation, as well.

3

17 [In two places, page J-52 is a box entitled:
18 "Potential Effects of Human Error on Accident Impacts" and
19 again in section J-1.4.2.2 "Methods and Approach for Analysis
20 of Non-Radiological Impacts of Transportation Accidents."
21 That's on page J-63.

22 It's indicated that utilizing only trained,
23 qualified and aware personnel will reduce accident risk. This
24 ignores the real risk of adding tens of thousands of shipments
25 and millions of trip miles to the national transportation

3 cont'd.

1 system.

2 As you draw from a pool of experienced drivers,
3 it will create a vacuum in the overall system to be filled by
4 new, inexperienced, less aware and safety conscious drivers.

5 In a head-on collision, for instance, between a
6 nuclear waste carrier and a gasoline tanker, the relative skill
7 and experience of the two drivers is reduced to the lowest
8 common denominator.]

4

9 [The impact on the national transportation system
10 is further underestimated in the DEIS by the failure to include
11 the fact that reusable shipping containers, casks and the
12 trucks or trains that deliver them to Yucca Mountain are going
13 to have to return for another load.

14 This means that tables J-11, J-12, J-13 and much
15 of the information extrapolated from them is going to have to
16 be revised upwards.

17 Table 2.7 indicates that normal traffic accident
18 risks are very high relative to the radiological risks, about
19 ninety-five percent.

20 Therefore, the number of miles traveled doubles,
21 the estimates of transportation risks will almost double
22 without regard to the casks being empty or full.]

5

23 [As high-level waste traffic routes are
24 established, they will certainly be followed by tens of
25 thousands of low-level nuclear waste shipments traveling the

5 cont'd. 1 same highways.

2 This will double and perhaps redouble the risk of
3 highway accidents. While the DEO -- DOE DEIS may not be
4 required to assess this additional risk, it is a cumulative
5 impact that should be acknowledged by someone.]

6 MR. LAWSON: About thirty seconds, please.

6 7 MR. WISSBECK: [To touch briefly on the
8 transportation casks, there is absolutely no real information
9 about how those trasks -- those casks are to be constructed.]

7 10 [Many of the safety factors discussed in the
11 transportation of high-level waste depend on the assumption
12 that low levels of radiation are not particularly dangerous.

13 The science of determining low level radiation
14 risk involves some of the most difficult measurements that any
15 scientist or group of scientists can undertake.

16 Radiologically induced cancer and genetic
17 mutations may occur decades after exposure. Exposure to a
18 given dosage may have different effects on different
19 individuals.

20 Sources of radiation, most natural and otherwise,
21 are so numerous, the cumulative exposures over a lifetime
22 cannot be determined.

23 Along with a myriad of other factors, the classic
24 double-blind study so useful in science is almost impossible to
25 establish as a way for measuring the effects of low level

7 cont'd.

1 radiation.

2 One scientific study that has been accepted was
3 done on the harm caused by x-rays to fetuses. Fetal x-rays can
4 double the risk of leukemia.

5 Even after the study was done and the results
6 verified, it took thirty years for physicians to stop x-raying
7 pregnant women.

8 Many sciences -- scientists were dumbfounded that
9 such a tiny dose of radiation would have a measurable effect.

10 And while the DEIS assumptions that small doses
11 of radiation, fractions of natural exposure are safe, that may
12 seem reasonable, but it ought to be acknowledged that all those
13 tables and mathematical formulas are not science, but rather
14 assumptions, garbage in, garbage out in the lexicon of '90s.]

15 I have a brief conclusion which I'd be happy to
16 give now or later.

17 MR. LAWSON: If it's brief.

8

18 MR. WISSBECK: [You have a Congressionally
19 mandated timeline to get the Yucca Mountain Environmental
20 Impact Statement considered. No such timeline exists for the
21 transportation of high-level nuclear wastes. The issues ought
22 to be considered separately.

23 More than a decade has gone into the study of the
24 suitability of Yucca Mountain for storing waste. No study has
25 been done on the problems of transportation. Only a broad

8 cont'd.

1 statement that you'll get it done somehow.

2 The devil is in the details and the details are
3 worthy of a separate Environmental Impact Statement on those
4 details to be worked out.]

5 MR. LAWSON: Thank you, sir.

6 MS. SWEENEY: Thank you.

7 MR. LAWSON: Paula Johnston and then Steven
8 Klump and Ed O'Connor.