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Testimony of Amy Shollenberger
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On the Department of Energy's Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada

January 11, 2000

Thank you for the opportunity to testify regarding the Department of Energy's Draft Environmental Impact Statement (DEIS) for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain. I will be following up my testimony today with detailed written comments.

I am a Senior Policy Analyst for the Critical Mass Energy Project of Public Citizen, a non-profit research, lobbying, and litigation organization founded by Ralph Nader in 1971. Public Citizen advocates for consumer protection and for government and corporate accountability, and is supported by over 150,000 members throughout the United States.

1... The Department of Energy's DEIS is simply unacceptable and should be rewritten. Not only does this report fail to adequately address the numerous public health, safety, and environmental issues associated with the Yucca Mountain Project, but it also buries the reader in a jumble of confusing cross-references and redundancies. This obfuscation makes it difficult—if not impossible—for interested parties to navigate the three-volume report and to provide specific and clear comments to the DOE regarding the improvement of the DEIS. The incomprehensibility of the DEIS deters all but the most determined citizens from participating in this important decision-making process. The lack of clarity in the EIS also makes it difficult for policy makers to make informed choices about the nuclear waste policy of the United States because it is nearly impossible to form a clear picture of the risk involved with a nuclear waste repository.

One example of this obfuscation appears in Section 6.3.2, "Impacts of Nevada Rail Transportation Implementing Alternatives." In the space of five introductory paragraphs, the reader is referred to one figure, two chapters, four sections, one appendix, and six reference documents. In addition, the section is set up in sections that first explore impacts common to all of the alternatives, then impacts of each separate alternative. The DEIS does not specify which alternative it prefers, and it does not show the total impacts for any of the alternatives (that is,

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...1 the reader is left to figure out how the common impacts and the separate impacts will accumulate). This is only one of many examples throughout the DEIS where information is presented in a confusing and frustrating manner.

2 Despite the difficulty of the DEIS, I would like to comment on a few specific problems. First of all, it is absolutely ridiculous that the DOE neither specifies its preference for a mode of transportation of nuclear waste (rail or truck) to the proposed repository, nor names the potential routes for the transportation campaign. The argument that the routes might change or that states may designate alternate routes is not an acceptable justification for refusing to name the routes used to analyze potential impacts. Radioactive waste will need to travel through 43 states, past the homes, workplaces, and schools of 50 million Americans to get to Yucca Mountain. Those citizens have a right to be informed about the risks they will face from this nuclear waste shipping campaign. Further, because the DOE has not done a baseline analysis of
3 the routes as they exist now, it is unfathomable how the DOE can predict potential future impacts along these routes. How can the DOE say that there are no environmental justice issues associated with transportation? How can the DOE be sure that no endangered or threatened species will be put in danger? It can't—because of the lack of baseline information.

4 Because the proposed repository is such an unprecedented endeavor, every effort must be made to explore the consequences of each and every action associated with the repository and to be aware of the total cumulative impact of all of those consequences. The DEIS fails in this regard. For example, the DEIS fails to examine the effects of a nuclear waste repository and thousands of shipments of nuclear waste over 24 years on property values in the fastest growing area of the country (Las Vegas/Clark County), not to mention the property values all across the country along the thousands of miles of transportation routes. Some routes may see several shipments a day for twenty-four years—this magnitude is sure to have a negative impact on the value of property along these routes.

5 Another problem with the DEIS is that there is no way to discover the total risk associated with the Yucca Mountain Project. The DEIS should clearly spell out what the accumulation of all the possible impacts could be, especially for the residents of southern Nevada. For instance, what if I were born near Yucca Mountain...what if I grew up drinking contaminated water and eating contaminated food...what if I am an involved worker at Yucca Mountain...what if I become pregnant and nurse my child? How can I determine from reading the DEIS what the total risk is to myself and my child? Or, what if I am a truck driver who transports casks from the east coast to Yucca Mountain, and I live along the transportation route, and my partner is a crossing guard at one of the intersections on the transportation route, and we have a child who attends a school on the route? How can I determine our total risk as a family?

6 For fifty years, this country has shied away from confronting the problems that the nuclear age has caused, and it is vital that we insist upon looking these problems in the face, finding sound solutions, and honestly characterizing the results of our decisions. If the DOE would draw an honest picture of the decision it has already made with regard to Yucca Mountain, this country would see that it is the wrong decision. If the DOE really believes that Yucca Mountain is safe, then it should do a full and honest analysis—which would require a complete rewrite of the DEIS.

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