

Melodie Garfield
7420 Alcove Glen Court
Las Vegas, NV 89129
(702) 656-9231
e-mail: FTSIQ@aol.com

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Wendy R. Dixon, EIS Project Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
P.O. Box 30307, Mail Stop 010
North Las Vegas, NV 89036-0307

Re: Comments on Draft EIS

I attended the meeting last night at the Grant Sawyer Building. First, a few comments on the meeting, then I will discuss the Draft EIS.

1 [Overall, the meeting was effectively managed. I was mildly disturbed, however, by the DOE Secretary (I believe Robin was her name) verbally thanking those who spoke in favor of the repository and saying nothing when opponents spoke. I would be interested to see whether the court reporter recorded her comments. This indicates an obvious DOE bias, and/or her personal bias; either way I believe it was inappropriate.

In addition, I would like to add my voice to those requesting more than one day of meetings for our community. The meeting was not well publicized. This is partially the fault of the local media, as well, and I will take this up with them.]

2 [As for the Draft EIS, I am disturbed that there are only two options evaluated: approving the repository (action) and status quo storage at existing sites (no action). Your hands may have been tied by Congress, I know, and I'll take this up with them as well. However, the amount of money having been spent thus far in the process should have accounted for alternative actions, such as ending production of the waste altogether, especially the waste produced by commercial nuclear power plants. Nuclear power plants account for only 20% of our nation's energy supply. Surely we can increase efficiency and/or find alternative sources to make up for this proposed loss. I understand that the potential development of new technologies and alternatives to disposal is highly speculative, but so are the impacts and consequences discussed in the remainder of the Draft EIS.]

3 [Our community has been subjected to underground nuclear testing in the recent past. Proponents argue that this type of testing is potentially more damaging to the environment than the risk of transporting and storing the radioactive waste, thus, we should

welcome the latter. I find this reasoning horrifying and fatalistic. We cannot stop the one, so we resign ourselves to the other? Can we not learn from our mistakes?

4 The Draft EIS states, "There is scientific uncertainty about the exact locations of the groundwater flow boundaries." In the next paragraph, it states, "The depth to groundwater and the arid environment [of the Yucca Mountain site] would combine to reduce the potential for meaningful contaminant migration." I'm not following this logic: "We really don't know where the groundwater is going, but we're sure it won't be contaminated . . . much." In addition, the Nye County Department of Natural Resources indicates that radioactivity from the US Ecology commercial low-level waste disposal facility has been detected off-site. If this is happening at a low-level waste facility, how can we be assured it will not happen at the Yucca Mountain site?

5 Transportation is a big issue, obviously not just for Nevadans. Proponents indicate that the accident-free past history of radioactive shipments should be a testament to the safety of future transportation. However, the amount of proposed waste shipped to the site in the first year alone will exceed the total amount shipped in the past thirty years. Shipments from over 70 sites across the country will travel through 43 states, frequently near highly populated urban areas. The Draft EIS indicates that between 13,400 and 49,500 shipments would occur over the 24-year transportation period. I'm no mathematician, but these numbers are staggering when one considers that an average 1 to 6 shipments will be occurring *each day*, some traveling all the way from the east coast. Past history cannot adequately predict the safety of these shipments in the future.

6 In the off-the-record, question-and-answer period DOE representatives indicated that the storage casks would be able to withstand severe accidents and fire without compromising their contents. Upon further questioning, however, DOE representatives admitted that the casks had not even been built yet! One need not be a logician to determine that the first assertion should not be made without even testing said casks.

7 In closing, I would like to ask the DOE to focus their resources on finding alternative energy sources, finding alternative uses for existing radioactive waste products, and to abandon the Yucca Mountain site. The short-term economic impacts of this course of action are much smaller than the immeasurable economic, environmental, and exposure consequences in the long run.

Sincerely,



Melodie Garfield