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◇ GOOD EVENING . . .

EIS001040

1 ◇ The proposed transportation and storage either interim or permanent of high level radioactive waste at Yucca Mountain, Nevada is bad environmental science, bad economics and bad politics. Even worse it represents a seemingly expedient political solution to a geological problem.

2 ◇ The Yucca Mountain site which is supposed to be isolated from the water aquifer theoretcically for thousands of years has been found with rain water that contains conaminants that are man-made and date from within the last 40 years. The movement of rain water through

3 the Yucca Mountain site should according to federal officials disqualify it as a site. The 1992 earthquake that destroyed the Yucca Mountain press center - should give you a clue that the site is much more than a Public Relations disaster - it is an environmental disaster waiting to

4 happen. There is not a shred of evidence to support that thermally hot - highly radioactive fuel rods will stay intact at the site. We are supposed to comment on non-existant and untested technology at an inappropriate site.

5 ◇ ACCORDING TO DOE DOCUMENT DE-ACO4-84A-25747 "THESE WASTES HAVE A POTENTIAL FOR CAUSING GREAT HARM." THEY ARE THERMALLY HOT (250,000 BTUS/HOUR) AND HIGHLY RADIOACTIVE. A RUPTURED CASK EITHER IN TRANSPORT OR IN THE DUMP WOULD BE A MAJOR ENVIRONMENTAL DISASTER THAT - COULD CONTAMINATE A LARGE AREA. THE RECENT DISASTER IN JAPAN WOULD BE NOTHING COMPARED TO A BREACH OF CONTAINMENT.

ONE

6 ◇ IN THE NRC'S FINAL ENVIRONMENTAL STATEMENT FOR THE CALLAWAY PLANT NUREG-75/011 SECTION 5-11 STATES THAT DURING NORMAL TRANSPORT (WITHOUT AN ACCIDENT 601,100 PEOPLE WOULD BE EXPOSED TO

7 GAMMA RADIATION DUE TO TRANSPORT OF ONE SHIPMENT WILL THE TRANSPORT 70,000 METRIC TONS OF MIXED COMMERCIAL AND 10,000 METRIC TONS OF MILITARY WASTES PAID FOR BY THE INDUSTRY THAT GENERATED IT? NO ONLY A SMALL DOWNPAYMENT THE MAJORITY OF THE $43 BILLION DOLLAR GOVERNMENT WELFARE PROGRAM FOR PRIVATE INDUSTRY WILL BE AT TAXPAYER AND RATE PAYER EXPENSE.

8 ◇ NOW I HAVE A SERIES OF QUESTIONS REGARDING TRANSPORTATION: WHO

9 WILL MONITOR WORKER AND PUBLIC EXPOSURE ? WHO WILL IMPLEMENT AND EVALUATE QUALITY ASSURANCE AND QUALITY CONTROL IN THE NRC, DOE

10... AND DOT ? WHO WILL RUN THE INCIDENT REPORTING SYSTEM? WHERE IS THE FUNDING FOR STATE AND LOCAL INSPECTORS AND ENFORCEMENT? WHO PAYS FOR AND PROVIDES FOR EVACUATION PLANS, TRAINING AND

11 RADIOLOGICAL PROTECTION EQUIPMENT? IF THERE IS NO PRICE-ANDERSON COVERAGE ON THEFT OR SABOTAGE IF A PLANNED TRANSPORT IS DIVERTED -

12 WHO PAYS FOR IT? WILL ADEQUATE EQUIPMENT BE READILY AVAILABLE IN EVERY STATE IN CASE THERE IS AN ACCIDENT (EG. HEAVY DUTY CRANES AND

13 TOW TRUCKS TO PICK UP CASKS)? WHEN WILL A ROUTE SPECIFIC COMPREHENSIVE PLAN WITH STATE AND LOCAL FEE/PERMIT PROGRAMS BE

...10 ESTABLISHED? WHO OVERSEES AND PAYS FOR STATE AND LOCAL LAW

14 ENFORCEMENT AND EMERGENCY RESPONSE TRAINING? WHO HOLDS TITLE TO

15 THE COMMERCIAL AND/OR DEFENSE WASTES? WHAT ARE THE SPECIFIC LIABILITIES OF UNION PACIFIC, BURLINGTON NORTHERN/SANTA FE AND TRI-STATE TRUCKING COMPANIES AND OTHERS INCLUDING STATE AND LOCAL

16 & 17 GOVENRMENTS? DURING AN ACCIDENT - WHO IS CHARGE? WHERE ARE THE EVALUATIONS OF COSTS, RISKS AND ROUTE SPECIFIC DATA ON POSSIBLE

18 ACCIDENTS, POPULATION DENSITY, WEATHER? WILL THE DOE DESIGNATE

19 DEDICATED TRAINS? WHERE ARE THE SPECIFIC GUIDELINES THAT GOVERN

20 THE MOVEMENT OF WASTE? WHY ISN'T THE DOE FOLLOWING THE NUCLEAR

21 WASTE POLICY ACT GUIDELINES? WHY HASN'T DOE CONSIDERED THE ECONOMIC, ENVIRONMENTAL AND PUBLIC SAFETY IMPACTS OF THE YUCCA

22 & 23 SITE. WHERE WILL MISSOURI'S ACCIDENT RESPONSE CENTER BE LOCATED? IS $500 MILLION FROM PRICE ANDERSON ENOUGH TO COVER AND MAJOR

24 ACCIDENT? IF YUCCA TURNS OUT TO NOT BE ACCEPTABLE WHAT HAPPENS TO THE MATERIAL STORED THERE ON A SO-CALLED INTERIM BASIS WILL I THEN BE SHIPPED SOMEWHERE ELSE?

25 ◇ HOW WILL FEDERAL RESPOMSBILITY AND FUNDING BE UTILIZED BY:

◇ 1. CARRIERS; ON AND OFF SITE DURING NORMAL OPERATIONS AND ACCIDENTS 2. STATE, TRIBAL AND LOCAL GOVERNMENTS ON AND OFF SITE

...16 (FOR EXAMPLE 12 MILES FROM AN ACCIDENT) 3. WHICH FEDERAL AGENCIES

...16 WILL AUTOMATICALLY RESPOND TO ACCIDENTS AND DO INSPECTIONS, ENFORCEMENT AND CLEAN UP? WHO COORDINATES NRC DOE FEMA EPA AND DOT? WHO IS IN CHARGE AT EACH STEP WHO HAS OVERSIGHT?

26 ◇ THE UNITED STATES GOVERNMENT SHOULD ABDICATE IT'S RESPONISBILITY AND ACCOUNTABLITY WHILE ALLOWING DECISIONS ABOUT SHIPPING CASKS, METHODS AND ROUTING UP TO PRIVATE CONTRACTORS. THAT MAY GO OUT

27 OF BUSINESS OR BANKRUPT. WHAT POSSIBLE SCIENTIFIC REASON WOULD DOE ALLOW MIXTURES OF WASTE FROM CIVILIAN, RESEARCH AND DEFENSE SOURCES?

28 ◇ JUST PRIOR TO THIS HEARING I READ A DOCUMENT TITLED THE TRANSPORTATION OF SPENT NUCLEAR FUEL AND HIGH-LEVEL WASTE SEPT 10 1996 AND I WAS SURPRISED TO FIND THAT NONE OF THE VECTRA, NAC STC, TN-8 AND TN-9, THE HI-STAR 100 OR THE MPC CASKS HAS BEEN CERTIFIED USED OR TESTED FOR USE. BEFORE ASKING FOR PUBLIC COMMENT DOE SHOULD HAVE TESTED AND PUBLISHED DATA REGARDING ANY MPC OR ANY OTHER PROPOSED CASKS.

29 ◇ We have been invited to comment on incomplete, imagined plans and scenarios. DOE has little experience with this type of waste. Less than 9 metric tons of High Level Waste have been transported. Now we are to contemplate 70,000 metric tons. Decisions are being based on an inadequate geologic site and non-existant, and untested transportation and storage casks on

30... unknown routes. Should we trust the Department of Energy to do it's job? We can learn from

...30 your institutional history. The federal government's past behavior can be used to predict it's future behavior. In this area we have six radioactive waste sites from the very beginning of the Atomic age - uranium mill tailings from the Fermi pile and the Hiroshima bomb production have leaked into ground water and leached from all of the sites. All located in a geologically unfit location - we are now 50 years later after inter agency squabbling, trading off of title and responsiblity and skyrocketing leukemia rates and spending millions of dollars studying the problem - after all this the U.S. Government is now starting to clean up the 50 year old mess here. Should we trust you to inflict your wastes on the people of Nevada and that you might

31 come up with a solution later - no we should not. Until there is safe, permanent solution - - Don't transport this material to Yucca and then find the site is unsuitable. The very real risks associated with a breach of containmnent, the unsuitability of Yucca, the exposure of workers and the public to gamma radiation under so-called normal transport would indicate that DOE should - Leave the wastes where they are.