FAX COVER SHEET

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To: DOE
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Fax: 3 pages and a cover page.

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01/11/2000 **Faxed to Ms. Wendy R. Dixon, EIS Project Manager**

Subject: Comments on Draft Environmental Impact Statement for Geologic Repository at Yucca Mountain.. Oral Summary Given in Las Vegas

1 I commented on this draft in Carson City. At that time I commented on what was contained in the document. Today I am commenting on what was not included and must be included in a revised DEIS. The revised DEIS must be re-circulated so that DOE can receive comments from more of the population impacted by this project. A DEIS public hearing in supposed to inform the public of the good and bad of the proposed project. DOE has gone out of their way to make sure that the general public is not informed. The "public hearing" are similar to a 3 act play. The first act is a sales pitch similar to the pitch for time shares, the second act puts the audience at ease by the question and answer period. An intermission helps to reduce the audience as many think they have
2 given their comments and after the intermission the public hearing begins. DOE does not want the public to be aware of the many routes through cities in 43 states. An example of this plan. One public hearing has been held in California. (In Lone Pine). What would be the reaction of the California Congressional Delegation if the public in California were made aware that nuclear waste was planned to be moved on interstate 5 and 15 from border to border.

3 This document which, at first glance, looks like a document that is the work of unbiased authors. Upon reading this document one very quickly comes to the conclusion that the authors did not want to really study the problem, but instead created a document that attempts to justify a political decision. The report uses adjectives to state conclusions. Sales brochures use adjectives to sell the product and this is a poor but expensive sales brochure for an Edsel of the energy business.

4 The DEIS on page 1-1 states that the Federal Government has the responsibility to dispose of these material permanently to protect the public health and the safety and the environment (bullet 1 2nd paragraph)

The second bullet states that the Federal Government needs to take precautions to ensure these materials do not adversely affect the public health and safety and the environment for this or future generations.

This DEIS was prepared to prove the above points and falls willfully short of accomplishing the above mandated requirements. I will attempt to show in the following few minutes how by establishing specifications and boundaries that do not meet the above requirements DOE has provided a sham document and is being used to follow the procedure established by NEPA.

5 This DEIS lists the materials (table A-8, volume 2 pg. A-17) to be stored. They are careful in this table to not list the half life of the elements. This is an example on how DOE presents a report which on the surface the general public receives a feeling that it must be good. Look how thick it is. DOE is very careful not to blatantly lie but they come very close. I guess in the legal sense DOE is puffing.

6 Vol. 1 pg. 1-6 paragraph 1.2.2.1 **Commercial Spent Nuclear Fuel,** DOE carefully describes the type of fuel stating that the material also contains *actinides*. The actinides are so dangerous that in 1973 NASA report with funding from the AEC. stated that the study was conducted because

6 cont'd. although the actinides are a small fraction of the total waste the half life of some of the materials is over a million years. What I am concerned about is that this small fraction is equivalent to about 9 tons of which a percentage will be dangerous far beyond the 20,000 years that DOE states is the safe period for ALL the waste stored in the repository. The report is bogus if the actinides are included. Some of these will be carried by the underground water table and will end up concentrated in the food chain of future generations. This is in direct conflict with the enabling directive that the Federal Government shall protect future generation and the environment. (pg. 1-1 bullet 2). There is NO proof anywhere is this document that the actinides are not dangerous. Why is this small fraction not dangerous to the public safety, health and the environment of future generations and is conflict with a published NASA report which describes the problem with actinides that are in the spent fuel rods,. Are any of the nuclide specified in Table I-9 chemically toxic materials?

7 pg. I-14, section 1.3.2.1 ***Identification of Waterborne Chemically Toxic Materials***, last paragraph, last sentence. "..while there are radiological limits set for plutonium, no chemical toxicity benchmarks have been developed. Therefore, because of this lack of data to analyze chemical toxicity, plutonium was not analyzed for the chemically screening." Question? Can the Secretary of DOE sign off on this DEIS without knowing the result of the analyis? Thesev questions must be answered.

8 Volume II pg. I-8 first paragraph. It is unclear to the reader why the analaysis was not continued out to a million years. This must be explained why it was not done BEFORE a revised DEIS is circulated. The authors attempt to confuse the reader by stating that some anayisi was done out to a million years but it is not clear if Neptunium-237 and Iodine-129 were included in the analysis to evaluate the impact on public health. Was it included?

9 Volume II pg. I-9 through I-12. What is the conclusion or impact of these nuclide on public health both in the repository and during trasportation to the site?. pg. 1-14, table I-9, Why was the performance assessment calculations only modeled to the year 2055 when some of the materials have a half life of over a million years?

10 DOE has attempted to minimize the threat of terrorists,(Vol. 1, pg. 6-33 6.2.4.2.3 ***Impacts of Acts of Sabotage*** The last sentence of the 2nd paragraph attempts to dismiss the problem with the following statement. " ... capable of penetrating a cask's shield wall leading to contaminants to the environment". The next question to be asked is "what contaminants and how long will the area be contaminated and what is the impact on property and people?. This was not answered under the guise of "it is classified". Now, thanks to a 60 minutes broadcast on December 26th, we now know that a depleted uranium warhead which can penetrate a tank will easily penetrate the cask, will be very dangerous to the public health The English recently published a report on the health problems of their personnel contaminated in the Desert Storm conflict The data to date only discusses the contamination from the depleted uranium war head against material that was not radioactive. The impact of depleted uranium against a shipping cask will create a dust cloud that will far more dangerous to public health than what occurred in Desert Storm... This must be studied and the impact must be shown around major transportation area where the greatest impact will be felt How does DOE propose to clean up the amount of radioactive and toxic dust that will be scattered by such a attack. The transportation of large containers carrying tons of material This entire area of transportation problems are woefully deficient in the DEIS.

11 To reduce the amount of public outcry, DOE has not shown any detail maps indicating which cities in each state will be exposed to significant risk.. This must be included in the revised DEIS and re-circulated and public hearings held before the DEIS is signed off by the Secretary of Energy.

13 The analysis that was conducted to evaluate the dust cloud created by an accident is fatally flawed. Volumn 2 pg. j-8, 4th paragraph states that the average meteorological conditions are the ***national*** averages for wind speed and atmospheric stability. This assumption is assurd for the State of California where North winds cause natural wind tunnels. An accident in one othe passes could spread the toxic dust cloud over the entire LA basin.. DOE must utilize the wind and atmospheric conditions for the area being studied for the impact of a terroist attack.

12 In closing DOE's proposal for storing nuclear waste is akin to how the public stored human waste in the early 1900's. The outhouse and septic tanks have been eliminated from the handbook of public health departments throughout the country because the long term impact on future generations. With this DEIS, DOE attempts to go back in time and revert to a hole in the ground to store waste. I truly believe our government can do a better job.

I again propose that we stop the construction of the proposed site for a 50 year period and during this time fund a program outside of DOE to study alternative methods and at the end of that time chose the best method for this country independent of cost. This is not a program that can be decided on cost that can impact the health of future generations. DOE has assigned a value to future human life and I do not believe they are God.

12 cont'd. Thank you for the time and I hope DOE will also agree with me and recommend to the Secretary that the project should be placed on hold for 50 years. Let's do what is right for this country and not only listen to the special interest energy lobby who control, at this time, some of the members of Congress.

Sincerely,

Lou deBottari
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