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Missouri Coalition for the Environment

6267 Delmar Boulevard, 2-E, Saint Louis, Missouri 63130

(314) 727-0600 Fax: (314) 727-1665

Email: royh@moenviron.org Webpage: <http://www.moenviron.org>

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EIS001229

Ms. Wendy Dixon
EIS Project Manager (M/S-010)
U. S. Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mtn. Site Characterization Office
P. O. Box 30307
North Las Vegas, NV 89036-0307

FEB 08 2000

Dear Ms. Dixon:

1 The Missouri Coalition for the Environment has serious concerns about the Department of Energy's proposal to
develop a geologic repository for spent nuclear fuel and other high-level radioactive wastes. [The Yucca
2 Mountain site in southern Nevada is in an active seismic zone and the long term stability of the site and the
proposed disposal scheme are unproven.] We are particularly concerned about the risks posed by transporting
these high-level wastes across the United States and through many large and small communities by both truck
and railroad transportation modes. Since Missouri is centrally located and has a network of interstate highways
and rail lines, and since most of the commercial nuclear reactors are located east of the Mississippi River while
the Yucca Mountain site is in the west, the potential impact on St. Louis and other Missouri communities is
significant.]

3 There is no known way to treat radioactive wastes to make them less hazardous to human health and the
environment. So the only thing that can be done to protect the public is to isolate these materials for extremely
long time periods until their radioactivity decays. Since many of the radioisotopes have very long half lives, the
time necessary to keep the wastes isolated is in the hundreds of thousands of years. No human designed or
constructed structure of any kind has been shown to be able to last for such an extended period. The Yucca
Mountain project relies on a combination of human-made and geologic barriers to contain the wastes.
However, over time geologic formations are subjected to stresses and may not provide for secure isolation of
these very toxic wastes.

4 The Yucca Mountain site and surrounding area has a history of earthquakes and volcanos. There have also been
major fluctuations in the water table. However, the Department of Energy has ceased consideration of any
other geologic repository sites before the Yucca Mountain has been demonstrated to be safe. The Missouri
Coalition for the Environment opposes transporting high-level wastes to this unproven and yet-to-be-
constructed repository.

5 There are many risks associated with the transportation these deadly materials. Every day on the highways and rail lines of America accidents occur. A significant number of these result in the spillage and release of toxic materials. Typically, local communities and crisis responders lack adequate preparation to handle toxic spills. The release of radioactivity from an accident involving the transport of high-level radioactive wastes would tax the ability of emergency responders even more than accidents involving most chemical toxins and could result in severe injury and even death.

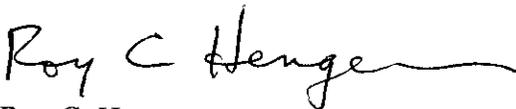
6 In addition to accidents there is the possibility for a hazardous release of radioactivity due to sabotage or terrorist attack. We are concerned that the casks used to ship the high-level wastes have not been tested to determine whether they can withstand the full range of accidents or terrorist attacks that can occur. Yet, if the Department of Energy's proposal is implemented it is likely that St. Louis and other large metropolitan areas will be exposed to the risks of one high-level waste shipment every other day, on average, for two to three decades.

7 With all the uncertainty that Yucca Mountain will prove to be a safe, reliable long term solution to the problem of high-level radioactive waste disposal, and given the risks of transporting this waste around the country, a better, if interim, course of action is for the Department of Energy to provide financial and technical support to electric utilities with nuclear reactors to help them store their irradiated fuel rod assemblies more safely. Existing storage structures can be upgraded and additional storage structures can be built on site. When the reactors are shut down, which is the absolutely needed in order to stop generating more hazardous radioactive wastes, the reactor containment buildings can be utilized for waste storage.

8 We note that the Department of Energy has been inconsistent in their recommendations for handling radioactive wastes - sometimes advocating moving them around the country and concentrating them in one or a few sites, and other times saying that keeping them at the sites where generated is safer and less costly. It is clear the federal government still does not have a long term answer to the dilemma of safe disposal of radioactive wastes - even after more than a half century of generating these highly toxic materials.

Again, we urge that high-level radioactive wastes not be transported on highways and rail lines around the country through our vulnerable communities. Thanks you for the opportunity to comment.

Sincerely,



Roy C. Hengerson
Environmental Policy Director