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Comments On The Draft Environmental Impact Statement For A Geologic Repository Of Spent Nuclear Fuel And High Level Radioactive Waste At Yucca Mountain, Nye County, Nevada

1 I would first like to add my name to the list of those requesting more public involvement and the extension of the comment period on the DEIS.

2 My first comment is on the definition of "disposal" in the glossary, stating that it is "isolation of the waste from the accessible environment". In my opinion, this definition should require isolation from the environment as a whole, not just the environment which the DOE allows us access to, and this includes the accessibility of that environment when there is no longer a DOE or anyone alive who knows what the DOE is.

3 My second comment is that both "no action" scenarios consider the continued disposition of HLRW at or near its present site as "no action" when in reality both the no action scenarios involve quite significant actions with specific ramifications - neither scenario described as "no action" actually constitutes no action, yet neither adequately explores the possibilities or viability of long term storage scenarios for high level radioactive wastes at or near their present locations.

4... On the So-called "no action" scenario #1:

The time considered of 10,000 years should instead be for the foreseeable future and beyond, the figure of 10,000 years is arbitrary and irrelevant to some of the extraordinarily dangerous waste products involved which remain highly toxic and poisonous for much longer than 10,000 years.

On pg 7-16 and 17 it is stated that the scenario assumes that the waste would be stored in independent spent nuclear fuel storage installations or in systems similar to these, which are then described as above-ground or below ground concrete buildings. These buildings and the corporate entities operating them are then to be relicensed every 20 years, and rebuilt every 100 years. I would request as an architect, that regardless of what the licensing requirements are and what legal issues have to be addressed in order to comply with codes and regulations regarding the construction of these HLRW storage buildings, that additional forethought be included in the conception and design of storage buildings that will last much longer than 100 years.

pg 7-23 outlines cultural resources and socioeconomic impacts of the "no action" scenario #1. I believe this area of the DEIS is seriously lacking in consideration of the continued and much enhanced public involvement in the supervision, oversight and monitoring of the wastes into the distant future. Such a commitment, for as long a period as we are talking about, is not something the human population has made before, and so represents a more serious and profound undertaking than the title "no action" implies. Construction projects more on the order of the great pyramids of Africa, the Cathedrals of Europe, or the prehistoric earthworks of America might begin to reflect the cultural importance of buildings suitable to store this extremely dangerous and toxic material and to keep it out of the water and safely contained for long periods of time. It is also possible that rather than having a low aesthetic impact as is stated in 7.2.1.10, these buildings could in fact have a deeply spiritual and aesthetic impact as centers for the expression of the populations' most serious commitment to the future and the safeguarding of all life on this planet from exposure to the HLRW. |

5... Section 7.2.1.13 on environmental justice effects of the so called "no action" scenario is also severely lacking in attention to the justice issues which are involved in NOT moving this waste. If Yucca Mountain is not used, yet the DOE requires that the waste be moved away from the sites where it has been generated, someone, somewhere will have to become the new, probably unwilling host to a HLRW disposal facility. The "no action" scenario #1 attributes no positive aspect to the justice exhibited when those communities which have been responsible for creating the waste are the same communities which stand guard over the waste into the foreseeable future and beyond.

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cont.

No positive aspect of the "no action" scenario #1 is attributed to the salvation of possible transportation accidents, unplanned exposures, diminished land values along transportation routes and the most unfortunate ruining of the Yucca Mountain location and surrounding urban areas at Las Vegas, Los Angeles and elsewhere by the placement of this waste there. The negative impacts in terms of environmental justice issues are much greater in fact if the waste is removed from where it is currently located, shipped through urban , often poor communities next to railroad tracks and highways, and dumped into a hole out back on the indian reservation as planned at Yucca Mountain.

The "no-action" scenario #2 is absolutely irresponsible, but a highly likely scenario given the nature of the nuclear industry and the regulating community. It is important that the people of the United States, their government, the DOE and the commercial utilities not allow this scenario to develop in a defacto manner. We all have a responsibility to monitor their actions so as not to allow it to develop. Collectively, the world population and the more responsible governments of the world have a responsibility to prevent this scenario from developing within this country and elsewhere on our planet.

Section 7.3.2.7 claims that the employment of personnel involved with construction and maintenance of 77 facilities is the only contributing factor in socioeconomic impacts due to on site storage. I would comment that the potential of collective public responsibility for the safeguarding of these wastes for the time period considered would allow the creation of much greater socioeconomic impact. Participation in the activity of oversight, construction and maintenance of the storage facilities beyond the previously mentioned 100 year planned obsolescence, the possibility of tourism and pilgrimages; and educational and interpretational opportunities to understand and contemplate the profoundly deep social and economic commitment that human ancestors made to nuclear technology and the ongoing efforts of current generations to keep its waste products from contaminating the planet could have enormous social, economic and political impacts which are not even alluded to in the DEIS. Furthermore, the actual economic impact of the "no action" scenario #2 (basically ignoring the problem and burying the waste on site) is not elaborated upon, and would include immediate short term economic benefit to the DOE, the public and the commercial utilities - this aspect of the problem, the potential unprofitability of dealing with this waste, contributes to the notion that Yucca Mountain is the only answer, because the utilities and waste handling contractors are already lined up at the trough like pigs. To address this waste problem involves huge economic subsidies by the people through their government, which would employ at great expense large nuclear industry contractors to hire low-cost workforces who would then build railroads, drive trucks and engineer casks and carriages and shuffle the waste around the country. The potential for local economic development in finding ways to collectively and democratically secure and isolate these wastes well into the future is great, yet the DEIS fails completely to explore it.

In summary, I do not think that the two scenarios for so-called "no action" are at all similar, and are not developed adequately to fully understand what the impact of long-term population-wide maintenance of the isolation of these wastes mean. I think that this failure to create a reasonable scenario for long term on site storage allows no adequate comparison to the environmental impact of transportation and storage of this waste at Yucca Mountain and I would request that more investigation be done on the possibility of long-term on site or near on site storage where the population as a whole is involved in the process of maintaining the isolation of these wastes from the environment.