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 Office of Civilian Radioactive Waste Management
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Dear Ms. Dixon,

1 This is my official comment for the public record on the Draft Environmental Impact Statement for the proposed Yucca Mountain Project. As a citizen of the United States, as a resident of the State of Washington, as a former resident of the State of Nevada, as a graduate school student in the study of the Environmental Science, as a teacher who see the children as the visionaries of the future, as an ecologist who works with endangered species, as an avid outdoor enthusiast, as an advocate for a clean and healthy environment, and as a woman who remembers the beauty and sacredness of growing up in the Mojave Desert of eastern California . . . I go on record, voicing my lack of support for the Yucca Mountain Project. For numerous reasons, which I will delineate in this letter, I do not, in any way, support the Yucca Mountain Project. It is among the most wasteful, irresponsible, disconcerting, and dangerous proposals that the U.S. Government or the Department of Energy has ever put forward to the American people.

2 If we just examine a small and critical portion of this project—Yucca Mountain itself—it becomes blatantly evident that this site is not a suitable location for 77,000 tons of high level radioactive waste. Southern Nevada is among the most seismically active regions in North America; since 1976, there have been over 600 seismic events of greater than 2.5 magnitude within a 50-mile radius of Yucca Mountain. Further, Yucca Mountain has over 30 active earthquake faultlines running through it.

3 This alone should be a strong indication that this is NOT a safe and stable site that would accomplish the mission laid out in the Nuclear Waste Policy Act of 1982 and its amendments. This Act specified that the DOE develop and operate a system that provides *safe storage, transportation, and final disposal* of nuclear waste in a geologic repository that would *isolate from the environment the nuclear waste for the duration of its life*. The waste targeted for Yucca Mountain accounts for 95% of the radioactivity of the Nuclear Age and will be hazardous for more than 300,000 years or 10,000 human generations. Locating a geologic repository for high level radioactive waste in the midst of 30 active earthquake faultlines *will not* achieve the mission of isolating this waste from the environment. The Yucca Mountain Project proposal does not adhere to the original guidelines of the Nuclear Waste Policy Act. It is clear that the Yucca Mountain Project is not about the geological isolation of radioactive waste, but about the *delayed environmental exposure of the waste*. It is apparent that as this site continues to fail to meet the current guidelines, the guidelines are being changed to fit the site. And I ask you: What constitutes a disqualifying condition or factor for the Yucca Mountain site and what specific conditions at Yucca Mountain would cause you to recommend the site be disqualified?

4 I have a great concern over the fact that the waste that would be buried in Yucca Mountain would be neither monitored nor retrievable. Monitoring equipment has yet to be developed that can withstand the high level of radioactivity and the high temperatures within the mountain, should it

- 4 | be opened as a geologic repository. If the waste cannot be monitored, how can we be assured that one of the casks is not leaking? If the waste can not be retrieved, how can we be assured that the leaking waste will not contaminate the groundwater? It has been determined that water moves rapidly through Yucca Mountain—it seems it would not take too long for this radioactive waste to find its way into the groundwater, into the environment, into our bodies. How do you account for this? In the DEIS, there is no mention of the communities which share the aquifer beneath Yucca Mountain. Nevada's largest dairy and one of its prime agricultural regions share this aquifer. The DEIS fails in its purpose by excluding any mention of these facts. Since the DOE has now acknowledged that the groundwater travel time at Yucca Mountain is so short that it meets the disqualifying condition in DOE's own siting guidelines, why hasn't Yucca Mountain been disqualified under the provisions of the Nuclear Waste Policy Act? | 5
- 6 | Another critical component of the Yucca Mountain Project is the transportation issue. Nearly 100,000 metric tons of nuclear waste on as many as 79,300 truck and 12,600 rail shipments would travel by rail and highway through 43 states, within a half-mile of 52 million people in casks that have not been fully or safely tested for a 30 year period. There are a great many concerns about this aspect of the proposal. First, according to government figures, approximately 50-260 accidents would occur and 250-900 "incidents" would be expected over the 30-year period. How can we afford to even have one accident occur during the transportation of high level radioactive waste! We cannot! It is evident from reading the DEIS that this aspect is very shortsighted. | 7
- 7 | Neither plans for either evacuation in case of an accident nor training for local emergency response departments have been considered. This is a crucial piece that is missing from this DEIS, and it is a piece that *must* have these plans clearly and explicitly delineated in the FEIS. | In addition, the DOE statement that the radiological impact from nuclear waste transportation would "not be significant" was arrived at by taking the number of people that the DOE projected would be injured by a nuclear waste shipping accident and averaging this total across the entire U.S. population. This is ludicrous and shameful! Is my hometown or my sister's city "insignificant" if they are the ones where a nuclear waste accident occurs? Each and every life is *significant*! We are NOT statistics! We are human beings! And we want the DOE to be accountable for each and every one of us if they decide to go forward with this proposal. | 8
- 9 | As I am very familiar with the NEPA process, I recognize a great many faults with this DEIS. It provides an inadequate evaluation of the uncertainties of this project. The DEIS is full of imprecise language like "very unlikely", "sufficient quantity", "probably would", et cetera. The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment. How are we supposed to make a sound decision on a project of enormous scope as Yucca Mountain when we cannot be certain of the science contained within? In addition, the EIS should inform decision-makers and the public of the reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. This EIS presents only two "choices": one being the Yucca Mountain Project, encompassing all the potential disaster wrought from irresponsible decision making, and the other being one of two No Action Alternatives, which would promote the on-site storage of radioactive waste. And while this DEIS has fulfilled the minimum requirements of the NEPA process (in the respect of including at least the No Action Alternative), it presents the public and the decision-makers with no real comparative analyses of other possible alternatives. If we are making a decision with affect our kin for 10,000 human generations, we need to explore *all alternatives and possibilities* and not rush into an irresponsible and hasty decision. | 9
- 10 ... | I am very skeptical about this "need" to create a geologic repository for the nation's high level radioactive waste. Yes, inevitably, we may need to create a repository somewhere . . . but in order to understand the "problem", we must open our vision wide enough to embrace the entire picture. There are 109 operating nuclear reactors in the U.S., which produce only 7.7% of the nation's power. And yet, these reactors produce the vast majority of the 6 metric tons generated each day in this country alone. Every 1000-megawatt reactor produces 25.4 metric tons of spend nuclear fuel waste every year, totally nearly 3000 tons nationwide annually. By 2010, it is | 10

- 10 anticipated that there will be 70,000 tons of spent nuclear fuel—which is over 1 million times more radioactive than unused fuel—but as of now, *2/3 of this fuel has not been used yet!* Imagine how much energy, money, and headaches we could save if we did not use this unused fuel! In addition, the projected capacity of Yucca Mountain is 70,000 tons. So, if Yucca Mountain opens in 2010, it will be filled as soon as it opens, and we will be right where we are now, asking the same question: What do we do with all this nuclear waste! It doesn't take a rocket scientist to state the clear and apparent answer: Stop producing it!
- 11 The most sensible and viable alternative to the current, politically driven, financially disastrous repository program is on-site, monitored and retrievable dry cask storage that has been proven to be safe for up to 100 years. If Yucca Mountain is failing miserably at meeting the DOE's own site guidelines, let's explore the possibilities, keep the waste where it is, and really think about what kind of legacy we wish to leave our children. Shipping all the country's high-level radioactive waste to the beautiful and sacred desert, storing it in a mountain located in the midst of the most seismically active region in the U.S., and then locking it up and throwing away the key while the waste inevitably leaks into the groundwater, is **not** taking into consideration our children and the 10,000 generations which will follow them. How can we so arrogantly dismiss the generations that will follow us? We cannot. We must create a world today that acknowledges their right to a clean and healthy environment tomorrow. We do not inherit the land from our ancestors; we borrow it from our children.

I thank you for your consideration and ask you to look critically at the failures and faults in the Yucca Mountain Project proposal, recognizing that this is a politically driven, financially disastrous repository program that is dismissing solid scientific findings that should have disqualified this site ages ago.

Sincerely,

Keba Fitzgerald

