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CC: President Clinton  
Senator Bayh  
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- 1 [Following careful consideration of DOE/EIS-020D: *The Draft Environmental Impact Statement for a Geological Repository of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County Nevada*, I have concluded that the DOE's plan for Yucca Mountain is not an prudent course of action.] This plan puts not only the residents of Nevada, but all Americans at risk. Enclosed are my comments on the draft and the DOE's plan.

The Dangers of the Yucca Mountain Project:  
A Response to DOE/EIS-020D:  
**The Draft Environmental Impact Statement for a Geological Repository of Spent  
Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain,  
Nye County Nevada**

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The dangerous legacy of the arms race and the commercial generation of electricity is the nuclear material that has subsequently been produced. This represents the greatest challenge of our time: the safe storage and disposal of radioactive waste.

2 Although a long term solution is required, the Yucca Mountain Project is not an advisable course of action. The "Draft Environmental Impact Statement for a Geologic Repository at Yucca Mountain" does not adequately provide for the safe transportation and storage of nuclear waste. The major flaws of the draft relate to transportation, construction, monitoring, safety and security. In addition this plan does not act in accordance with the individual rights of US citizens.

3 Before any waste can be stored at Yucca Mountain it must be shipped to Nevada. The government's belief that nuclear waste can be shipped with a low accident probability is based upon faulty assumptions. (Lamb & Resnikoff, 3) Most of the waste will be traveling from sites east of Nevada. This model fails to address changes in speed limits, traffic density, frequency of bridges along the routes and movement through different states. These oversights invalidate any conclusions stemming from this model, and raise doubts as to the actual safety of the proposition.

4 If all the nuclear waste reaches the site safely, the issue of long term storage remains. The government's construction plans are incomplete and unsafe. The government calls for nuclear waste disposal to begin prior to the completion of the site. However, Section 4.1.8.1 does not consider accidents that may occur during the construction phase, and cannot draw applicable conclusions because it uses conceptual models and "final facility design details are not available." The possibility of an incident due to a construction mishap must be taken in to account in any complete safety analysis.

5 The plans for closing the site lack a strategy for long term monitoring. The report does not call for continued vigilance but only for the site to be marked and for "continuing performance confirmation as necessarily." (4.1) This ambiguous plan is not satisfactory in light of the lasting dangers nuclear storage imposes on future generations. A clear and comprehensive long-term safety plan should be adopted prior to storage, rather than a "wait and see" attitude. Nuclear waste is currently carefully monitored at the sites where it is produced. Until there is a guarantee that the same precautions will be taken at Yucca Mountain it seems imprudent to relocate the nuclear material.

7 Though wars were the greatest threat to the US of the 20<sup>th</sup> century, the greatest threat of the 21<sup>st</sup> century will likely be terrorism. The DOE believes that sabotage is "unlikely" (4.1.8.3). But, the Yucca Mountain Project presents opportunity for terrorism both at the facility and in transportation phase, the likes of which has never before been seen. This threat is much greater than the terrorist threats on the recent Y2K celebrations. Maintaining security protocols indefinitely which are suitable for this threat are not planned and are not economically feasible.

8 This project also creates a new the threat of a catastrophic nuclear disaster. Though any nuclear event would be harmful to our ecosystem, putting all our nuclear waste in one place creates an added danger that does not exist when nuclear waste deposits are spread though out the country. Such an event would have serious national and world health implications.

9

Perhaps most disturbing is the fact that the government's Yucca Mountain Project overlooks the concept of free informed consent on behalf of its citizens. Most apparent are the protests of the citizens of Nevada who are strongly against these plans, and who do not themselves utilize nuclear power. However, consideration must be granted to individuals whose homes are downwind of the mountain. And finally, at risk are the Americans who use our roadways and who live near transportation routes. In short, the Yucca Mountain program puts all of us at risk, a risk that many Americans are not willing to take.

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Perhaps after an open dialogue and further improvement upon the Yucca Mountain Plans, a safe depository program could be created. . However, due to the restrictions imposed by the Nuclear Waste Policy Act of 1982, such a course of action is not an option. And as such I am compelled to recommend the "no-action alternative."