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EIS001433

FEB 14 2000

ANALYSIS OF YUCCA MOUNTAIN DRAFT ENVIRONMENTAL IMPACT STATEMENT

DATE: 2/6/2000

TO: PRESIDENT CLINTON
SENATOR MIKE DEWINE
SENATOR GEORGE VOINOVICH
REPRESENTATIVE DEBORAH PRYCE
W.R. DIXON, US DOE

FROM: ANNE COLLEEN COOPER
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RE: YUCCA MOUNTAIN DRAFT ENVIRONMENTAL IMPACT STATEMENT

1 Enclosed is my analysis of the Draft Environmental Impact Statement (DEIS) for the United States Department of Energy's proposed geological repository for nuclear waste at Yucca Mountain, Nevada. The Yucca Mountain DEIS is incomplete, ethically unsound, and misleading for many reasons. It makes a mockery of the legal right of the U.S. public and scientific community to informed consent and commentary in purporting to be a comprehensive scientific analysis of the Yucca Mountain Project.

2 Even a single reading through one section of the DEIS presents numerous examples of the insufficiency of this report. However, it is not only the DEIS which is flawed, but the entire project. The Yucca Mountain site itself is proven to be unsafe and inappropriate for the long-term storage of nuclear waste. The conclusion of the Department of Energy to support the construction of the proposed facility is highly questionable and blatantly contrary to public health and environmental concerns.

3 Please receive with comments my deep concern over the future implications of this issue. I ask you to prevent the construction of this dangerous, scientifically and ethically unsound repository. The welfare of our nations demands it.

**Comments on the
DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR A
GEOLOGICAL REPOSITORY FOR THE DISPOSAL OF SPENT NUCLEAR
FUEL AND HIGH-LEVEL RADIOACTIVE WASTE AT YUCCA MOUNTAIN,
NYE COUNTY, NEVADA.**

By

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Submitted to:

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Comments on the Yucca Mountain DEIS

4 The US Department of Energy (DOE) was authorized by the Nuclear Waste Policy Act of 1982 to evaluate the potential for a geological repository site for nuclear waste, pursuant with the responsibility of the federal government for safe, effective storage of spent nuclear fuel and high-level radioactive waste. [The Draft Environmental Impact Statement for the proposed repository at Yucca Mountain is intended to offer the public and the scientific community an opportunity to become informed about and comment regarding the Action Proposals set forth in the DEIS. However, the DEIS is not adequate to achieving this goal. In reference to only a few examples, this commentary reveals that the DEIS contains numerous inconsistencies and fallacies which demand attention in the final EIS. However, regardless of the improvements made in the final impact statement, the Yucca Mountain site is inappropriate and dangerous choice for the proposed repository.]

- 5 continued on page 3
1. [The DEIS proposal is arguably incorrect about providing a “consistent analytical basis for comparing the No-Action Alternative and the Proposed Action.” (DEIS, 7.7) One requirement of the National Environmental Policy Act is that proposed alternatives must be reasonable; however, neither of the two scenarios of the No-Action alternative is reasonable (thus creating a situation of Fallacy of Bifurcation). Scenario 1 of the No-Action alternative assumes that DOE and commercial utilities

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continued

would maintain control over the waste at the current 77 sites for 10,000 years. Scenario 2 assumes that the waste would remain at the current 77 sites under monitoring for 100 years, after which time the waste would be abandoned, such that the storage facilities “would begin to deteriorate and the radioactive materials... would eventually be released to the environment.” (DEIS 7.7) Thus, the DEIS does not satisfy the requirement of the National Environmental Policy Act that alternatives be reasonable, nor can it logically justify the Proposed Action plan as the preferred alternative, because the No-Action alternative is unreasonable. |

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2. | The DEIS is arguably incorrect about effectiveness of proposed long-term deterrents to public entrance of the Yucca Mountain vicinity (passive institutional controls including markers and engineered barriers [DEIS S-37]) because it does not take into account the risks of human-initiated threats of sabotage or terrorism in the next 10,000 years to the Yucca mountain site. |

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3. | The DEIS is arguably incorrect about estimated health, socioeconomic, and environmental risks associated with transportation because it does not consider specific transportation routes for rail and highway shipments. (DEIS 8.4) |

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4. | The DEIS is arguably incorrect in its presentation of predicted environmental and public health threats posed by the construction, monitoring and eventual closure of a geological repository at Yucca Mountain, because it does not offer a specific preferred repository design. (DEIS 8.1, 8.2) |

9

5. | The predicted long-term health consequences of the construction, operation, monitoring and closure of the geological repository are arguably incorrect about yearly predicted cancer fatalities because the figures are based upon data for male subjects, and the more sensitive parts of the population, such a children and pregnant women, are not taken into account. (DEIS F.2.1) |

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6. | The DOE is arguably incorrect about its justification to shorten time for public commentary on the DEIS from the proposed 180 period to 90 days because 1) suspension of EIS activities due to budget cuts and resulting “compression” of EIS schedule are irrelevant to the public’s right to full review time, and 2) increased availability of DEIS documentation over the internet is likewise irrelevant to the right to the public’s right to comment. (Farrett) |

Sources:

Ballard, James David. “The Impacts of Sabotage and Terrorism on Nuclear Waste Shipments: A Critique of the U.S. Department of Energy’s Draft Environmental Impact Statement (DOE/EIS-0250D) for the Proposed Yucca Mountain, Nevada, Geological Repository.” (26 January 2000).

Farrett, Jake H. Acting Director, Office of Civilian Radioactive Waste Management. Letter to Robert Loux, Executive Director of Nevada Agency for Nuclear Projects. 25 May 1999.

“Draft Environmental Impact Statement for a Geological Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada.” (DOE/EIS-0250D) <http://www.ymp.gov/deis.htm> (24 January 2000).