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1 DAVID ELLISON: My name is David Ellison, I'm a member of the American Institute of Architects and registered to practice architecture in the State of Ohio. I'm also with the Ohio Green Party Presidential Campaign Committee, and a member of Performers and Artists for Nuclear Armament and I am speaking on my own behalf tonight. I'd first like to add my name to the list of people requesting more public involvement in this process and for 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, quote, "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 that -- to that environment when there is no longer a DOE and no longer anyone who remembers what the DOE is or was.

3 My second comment is that both, quote, "no action scenarios" consider the continued disposition of high-level radioactive waste at or near its present site as no action but 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 number one, 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 that 10,000 years. On page 7-16 and 17 it's stated that scenario assumes that the waste would be stored in independent spent nuclear fuel installations or in systems similar to these which are then described as ground or below ground concrete buildings. These buildings and the corporate entities operating them are 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 buildings to store high-level radioactive waste, that additional forethought be included in the conception and design of storage buildings that would last much longer than 100 years.

Page 7-23 outlines cultural resources and socioeconomic impacts of the no action scenario number one. 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 waste into the distant future.

Such a commitment for as long a period of time 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 earth works of America might begin to reflect the cultural importance of building suitable to store the extremely dangerous and toxic material

have a deeply spiritual aesthetic impact as centers for the expressions of the population's most serious commitment to the future and safe guarding of all life on this planet from exposure to the high-level radioactive wastes.

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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 high-level radioactive waste disposal facility. The quote no action scenario number one, attributes no positive aspect to the justice exhibited when those communities have been responsible for creating the waste, are the same communities which stand guard over that waste for the foreseeable future and beyond.

And I have about three and a half more minutes and if I have to continue this later, then that's what I'm going to do.