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EIS001639



Alma Romero
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To: Bonnie Fogdall/YM/RWDOE@CRWMS
cc: Joan Bayne/YD/RWDOE@CRWMS, Doreen Denson/YD/RWDOE@CRWMS

Subject: EIS Comments

Please enter these into the CRD. I have already replied to JD Kemp thanking him for forwarding Rick's Kostelaz's comments.

Thanks

----- Forwarded by Alma Romero/YD/RWDOE on 02/22/2000 01:53 PM -----

JD Kemp 02/22/2000 12:52

To: Wendy Dixon/YD/RWDOE@CRWMS
cc: ckostelaz@net-nerds.com

Subject: EIS Comments

Ms. Dixon:

I got the following message from my friend Rick Kostelaz, a long-time resident of Pahrump. I couldn't properly answer his concerns, and so I forwarded them to my boss, Bill Hodson. Bill suggested you might be the appropriate point of contact for this note.

If you could respond to Rick, and possibly allay some of his worries, I would be most appreciative.

Thanks-
JD Kemp

----- Forwarded by JD Kemp/YM/RWDOE on 02/22/2000 12:48 PM -----



Rick Kostelaz <ckostelaz@net-nerds.com> on 02/19/2000 09:53:11 PM

To: JD Kemp/YM/RWDOE
cc:

Subject: Message from Rick

Analysis of the DOE report

As many of you know we here in Nevada are very concerned about the Nuclear Waste Dump which has been proposed for activation here in Nye County, Nevada. What you may not know is that the original law passed by the United States Congress authorized the Department of Energy (DOE) to investigate many sites then return to Congress with recommendations on the best site.

As it turned out, for budget reasons, the DOE has only investigated one site, Yucca Mountain here in Nye county Nevada, which is less than one hundred miles north of Pahrump. Correspondingly, we will never really know if Yucca Mountain is the best site for storing long term nuclear waste.

The DOE has recently released their Environmental Impact Statement (EIS) as required by the EPA. This study is supposed to be an authoritative examination which truly represents the impact that a Nuclear Waste Dump will have on the environment and inhabitants of Nevada.

Unfortunately, the DOE seems to have taken the road of expediency in their trek to find a place for the nations nuclear waste. The EIS is deficient in many areas some of which I will delineate below.

Waterborne Contaminates

- 2 The EIS confirms that the release of radioactive contamination into the water supply for Amargosa Valley (fifty miles north of Pahrump) will occur: only the timing and magnitude of the releases are uncertain. Further, the EIS does not identify the measures that will be taken to mitigate the contamination or other adverse impacts that will occur.
- 3 The EIS is flawed in that discussions concerning waterborne radiological consequences are vague. The tables and conclusions can not be independently verified because the various tables are presented with inconsistent units and without enough information to verify the conversion calculations. It is also impossible to trace information from one table to another. As a result the conclusions of the waterborne radiological consequences as presented are unverifiable.

Erroneous Assumptions

- 4 There are fifty-three individual radionuclides in reactor waste. However only nine "dominant" radionuclides were selected for analysis. It is interesting to note that plutonium-241, with a half-life of 13 years, was one of the selected "dominant" radionuclides included in the study. However, americium-241, with a half life of 458 years was excluded.
- 5 When exploring the effects of a 27,000 cubic meter spill of contaminated ground water into the water supply of Armagosa Valley the EIS assumes dilution of the contaminates into the valleys entire yearly water usage of 17.3 million cubic meters. Clearly, the contamination would occur over a very short period and should have been diluted over the period of the spill. This calculation probably would have far exceeded the safe level of allowable radionuclides.
- 6 The EIS bases some of its conclusions on analysis which "follows the recommended approach of National Research Council, 1995 (Technical Basis for Yucca Mountain Standards)". In using this "recommended approach" the EIS assumes that populations in Nevada would remain at their present locations and densities. This assumption and the basis for it are not valid.

The report continues to state that because it is impossible to know the number of future persons residing in the Yucca Mountain area, it is impossible to determine the total number of fatal cancers caused by exposure to radionuclides. This kind of logic is clearly flawed.

In conclusion the report states, "We therefore conclude that there is no technical basis for establishing a population-risk standard that would limit the risk to the nearby population for a Yucca Mountain Repository."
- 7... The EIS makes use of "bulk permeabilities" in their analysis of groundwater flow and

7 cont. contaminant transport. The use "bulk" or average transport times tends to reduce the real effects of groundwater contamination. The study ignores the fact that groundwater flow will predominate through preferential pathways that exhibit the fastest not the "bulk" permeabilities. Thus the report tends to elucidate the average rather than the worst case scenario.

Transportation

- 8 All hazardous materials will be transported through Nye county Nevada. The report does not address the potential effects of transport on the value of commercial and residential properties along the transportation routes or the potential effects on visitors and travelers. In a state that depends upon tourism as its major industry, the report is sorely lacking in defining the impact of Yucca Mountain on the economic base of Nevada.
- 9 The EIS does not fully or adequately address the costs and consequences of potential transportation incidents. In evaluating a hypothetical "maximum reasonably foreseeable accident scenario," the report claims that the greatest consequences for the "legal-weight truck" scenario would occur under stable meteorological conditions and in an urban area. The scenario also only looks at inhalation exposure, the evaluation does not look at the surface water or groundwater pathways.

It is unrealistic to assume that a truck accident would most likely occur in good weather and in an urban environment where a rapid response clean up team would be available. A more likely scenario would be on a mountain pass during inclement weather. Consider the following hypothetical example:

A release of 2,000 curies occurs as a result of an accident during a rainstorm on a mountainous grade of U.S. Interstate 15 to the north of Glendale, Nevada. One-half of the radionuclides (with an activity of 1,000 curies) are quickly transported into the Muddy River, and thence rapidly into Lake Mead. With a total storage capacity of 29.7 million acre-feet and assuming full dispersion and mixing, the resulting concentration of radionuclides in the water in Lake Mead can be calculated to be 27.3 picocuries/Liter. It would require 54 million acre-feet of water to dilute 1,000 curies to the safe drinking water standard of 15 picocuries/L. This kind of a scenario would devastate the economy of southern Nevada.

The fact that the EIS did not evaluate the consequences of surface water or ground water contamination as a result the "maximum reasonably foreseeable accident scenario" is a major deficiency in the EIS.

Rick



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