

Naomi Lewis

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To: Bonnie Fogdall/YM/RWDOE@CRWMS
cc:

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Subject: YMP Comments Posting

----- Forwarded by Naomi Lewis/YM/RWDOE on 02/28/2000 07:41 AM -----
YMP Comments Posting

February 26, 2000 13:31:10

IP address: 207.155.187.17
Name: The Frost Family
E-mail: Frosts@cris.com
Comments: Wendy Dixon, EIS Project Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
US Department of Energy
PO Box 30307, Mail Stop 010
North Las Vegas, Nevada 89036-0307

Regarding the Yucca Mountain Site:

- 1 ? Accessibility. [The DEIS constantly buries the reader in a jumble of confusing cross-references and redundancies. This obfuscation makes it difficult-if not impossible-for interested parties to navigate the three-volume report and to provide specific and clear comments to the DOE regarding the improvement of the DEIS.]
- 2 ? Transportation. [The DEIS should clearly and accurately characterize the risks involved along the transportation routes, and it should use the most current information available to do so.] Further, [it should include site-specific data to show the effects of accidents in highly populated areas or areas where it would be difficult to retrieve a leaking cask (such as ravines and rivers) or where accidents might be more likely because of extreme weather, steep inclines, or sharp curves.] The DEIS should also note which mode of transportation the DOE prefers-rail or truck.]
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- 5 ? Transportation. [The DEIS fails to address the fact that the number of shipments and the amount of radioactive material that will be shipped is unprecedented in world history. About 90% of the volume would be spent fuel from nuclear power plants, and virtually none of this type of material has ever been shipped before. The DOE has posted the routes it used to complete the DEIS on its web site. This is a good start, but this information should be included in the DEIS. The DEIS should include both maps and tables showing the routes and number of shipments expected on each route, as well as where the waste shipped on each route will originate, and how many casks will be involved (especially for rail shipments).]
- 6... ? Emergency Preparedness. [The DEIS does not examine what emergency response personnel training and equipment would be needed in all of the communities along the transportation routes and what the specific impacts of a transportation accident would be. Many local communities lack the special equipment and training necessary to

6 cont. respond to a radiological accident. Further, many hospitals do not have isolation rooms for radioactively contaminated victims. This analysis should at least be done for the major population centers along the transportation routes (populations of 100,000 or more). The DEIS should indicate what emergency response equipment, facilities, and trained personnel are available in these communities, and what the effects of a transportation accident could be based on what is currently available.]

7 ? Environmental Justice. [The DOE approached its environmental justice analysis by first reviewing the proposed action to see if it would likely result in high and adverse human health or environmental impacts to the general population, and then supposedly checking to see if any identified impacts would disproportionately affect specific minority or low-income communities. With this method, the DOE was unable to identify any environmental justice issues. It seems that in order to achieve true environmental justice, the DOE would need to identify all of the minority and low-income communities that could potentially be affected and then check to see if there would be any negative impacts to these communities that would be disproportionate to other communities.]
Papermail:]
