

MR. ESSINGTON: Thank you. The National Park Service has completed its review and comments of Draft Environmental Statement and would like to take the opportunity today to convey that information to the audience and to the public in general. However, given the time constraint here, it's not possible at all to read that entire document; but perhaps I can give a flavor of that material by reading from the cover letter and the general statements.

The cover letter is addressed, of course, to Wendy Dixon and goes on, "The National Park Service wishes to extend its gratitude for being provided with the opportunity to review and comment on the Draft Environmental Impact Statement for the geologic repository for the disposal of spent nuclear fuel and high-level radioactive waste at Yucca Mountain, Nye County, Nevada. As you are aware, Death Valley National Park is the largest national park unit in the lower 48 states, and is only 22 miles downgrade from the site. The Lake Mead National Recreational Area and Great Basin National Park lie along transportation routes leading to the site, and because the National Park Service is mandated to manage these areas in perpetuity, it takes considerable interest in the proposed disposal of radioactive waste at Yucca Mountain.

"The enclosed document provides comments from the National Park Service to the material presented in the Draft EIS. [The National Park Service finds, in general, the EIS almost totally ignores very harmful and potential impacts to Death Valley National Park. Should leakage occur into the aquifer underlying Yucca Mountain, Death Valley National Park would be irreparably impacted."

"Accordingly, the National Park Service firmly believes that a dramatically more thorough analysis needs to be done. This next analysis needs to address the hazards that will be created by disposal at Yucca Mountain to one of America's National Park units.

"This analysis needs to address the natural resources impacts, but equally important the economic impacts to loss of the tourist industry to this part of California and Nevada."

"The general statement section: The obvious effort expended to prepare the Draft EIS, notwithstanding, the National Park Service has several comments relative to the adequacy of the environmental impact analysis regarding potential impacts arising from the long-term storage of high-level nuclear waste at Yucca Mountain."

"The Draft EIS creates a false impression that all of the detailed contamination issues have been covered. The summary is excessive and contains what are seen to be misleading statements. In general, the National Park Service believes the Draft Environmental Impact Statement is deficient in its analysis of the potential impacts to the natural environment and totally avoids discussion of impacts to park resources."

"While some discussion is provided of the possible impact to the human residents in the Amargosa Desert area, a limited analysis is given to the impact to the natural environment."

"The National Park Service's comments are related primarily to water resources, specifically the critical water resources to Death Valley National Park and its Devil's Hole detached management unit.

"Additional concern is herein expressed concerning threats to the environment posed by the transportation of nuclear waste materials in and near Death Valley National Park, Great Basin National Park, and Lake Mead National Recreation Area. The proposed repository site is located in a volcanic rock sequence directly overlying carbonate rock that comprise the regionally significant deep aquifer -- deep carbonate rock aquifer.

...2 "The repository site is also contained within the Death Valley water flow system, which is known to discharge at Death Valley National Park. Groundwater discharged at Park Springs is the sole source of water for critical park water and water related resources, and provides domestic water resources for park visitors, park staff, the Timbisha Shoshone tribe, the Furnace Creek Resort complex, state and county staffs.

"The EIS lacks analysis of the scenario involving radionuclides leaking into the proposed repository and migrating to the water table contaminating the regional groundwater flow systems that ultimately discharge at the springs of Death Valley and at Devil's Hole. ]

3 "The National Park Service is mandated to manage the land under its care in perpetuity, as opposed to the time constraints employed in this work. Dangerous levels of radiation may exist long after the predicted hundred-thousand-year life of the repository. For example, Neptunium 237, which is thought to play an important role in human health risk, is listed as a constituent of the waste packages that are planned to be put in the Yucca Mountain repository. That element has a half life of 2.1 million years, and this element alone could result in serious contamination of park resources."

FACILITATOR HOLMES: If you could wrap up in about a minute.

4 MR. ESSINGTON: Very, very soon. [An adequate discussion is not provided in the Draft EIS relative to whether the proposed repository containments are safe from the occurrence of seismic disturbances; for example, earthquakes are common to this area. The park service is concerned that this possibility alone may lead to a potential release of radionuclides into the environment, specifically the regional underground water system that underlies the proposed repository and downgrading springs, specifically those which discharge within the park.] In addition, [the park service believes the Draft EIS inadequately assesses possible climatic changes over the next 10,000 years. Increase in precipitation could conceivably result in the transport of radionuclides from the repository to the water table.] Thank you.

5 FACILITATOR HOLMES: Ellis Ray, and the next would be Bob Nelson.