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People Against Radioactive Dumping420 "E" Street
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June 25, 2001

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Secretary of Energy
Attention: Mr. Lake Barrett
Acting Director
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585Attention: Dr. Jane Summetson
EIS Document Manager
U. S. Department of Energy
Yucca Mountain Site Characterization Office
P.O. Box 30307 M/S 010
North Las Vegas, NV 89036-0307ELECTRONIC SUBMISSION AT
www.ymp.gov on 6/25/2001
HARD COPY VIA FACSIMILE
to 1.800.967.0739RE: Yucca Mountain Supplement to the Draft Environmental Impact Statement for a
Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level
Radioactive Waste at Yucca Mountain, Nye County, Nevada *(DOE/EIS-0250D-S)

1 **People Against Radioactive Dumping (PARD) represents the 25,000 people who have signed our voter petitions to require the responsible management of nuclear materials. The Department of Energy (DOE)'s proposal to transport to and dispose of nuclear waste at Yucca Mountain, Nevada either as a temporary or permanent repository for high-level nuclear waste is in opposition to what voters have overwhelmingly petitioned government for. After considering the many unanswered questions about the transportation scenario for shipping waste from reactor sites across the country to Nevada, informed voters prefer the safer alternative—onsite storage where the waste is generated.**

2... **PARD objects to the Yucca Mountain Project, and to the launching of an unprecedented nuclear transportation scheme, with 77,000 tons of high-level radioactive waste shipments passing through 43 states, within half a mile of 50 million Americans. Likely transportation routes through our state include I-40 and I-10 through the portions of San Bernardino County, California where PARDs 20,000 registered voters signed a petition to outlaw irresponsible nuclear waste disposal practices such as that Yucca Mountain. No safe way to transport nuclear waste exists therefore PARD urges on site monitored retrievable storage in long-lived self contained vaults where the waste is generated.**

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2 cont As the DOE rushes to recommend Yucca Mountain for development as a nuclear repository, many concerns remain about the suitability of site itself—such as the fractures and faults in the mountain and the inevitable contamination of ground water; In addition, many issues related to the large scale transportation of high-level waste through our state have not been addressed. Approximately 11,000 comments - more than half related to transportation concerns - were submitted on the Draft Environmental Impact Statement for the Yucca Mountain Project, but the DOE has yet to respond and we object to this highly lacking and inadequate assessment of issues.

3 Transporting high-level nuclear waste is inherently dangerous because it
4 elevates the risk of radiological release and disperses this risk along
5 transportation routes where our emergency response personnel may lack the
6 training and equipment necessary to respond effectively to a radiological
7 accident. Yet the Draft Environmental Impact Statement for the Yucca
8 Mountain Project deals inadequately with the transportation scenario. For
9 example, the DOE has not specified which routes would be used for Yucca
10 Mountain shipments or whether the waste would travel by train or by truck,
11 and has not identified a clear process for making these decisions.

12 The canisters that would be used to transport nuclear waste to Yucca
13 Mountain have not been subjected to physical testing, and computer models
14 rely on outdated testing parameters. Unanswered questions remain about the
15 risk of sabotage and liability in the case of an accident. Even without an
16 accident, nuclear waste transportation canisters routinely emit the
17 equivalent of one chest x-ray per hour of harmful radiation. Also, property
18 values have been shown to decline along nuclear waste shipment routes.

By any sane measure, the civil defense issue of the vulnerability created by storing massive quantities of high level waste all in one location so close to Las Vegas would reasonably rule out the Yucca Mountain proposal.

For the reasons listed above, we respectfully request that the DOE cease and desist spending public funds on the Yucca Mountain project, that this project be sacked. Further, transportation issues must be addressed before any type of proposal is recommended to ship waste to any location. PARD and those whom it represents opposes the Yucca Mountain repository proposal since the concerns expressed above have not been addressed and the risk to human and environmental health and safety of transporting nuclear waste to Nevada out weighs any possible merit of transporting to and dumping the waste in Yucca Mountain;

Sincerely,

Ruth Lopez, Director
in behalf of
People Against Radioactive Dumping (PARD)

Governor Davis
U.S. Senators
U.S. Representative

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P. S.

8 This is to request a three month extension of the comment period for the "Supplement to the Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada *(DOE/EIS-0250D-S).

A comment period of only forty-five days on this new document excludes the possibility of meaningful public participation, especially considering that no advance notice was given before the Supplement was released. The Department appears not to have taken into account the time required for members of the public to obtain the document, analyze its contents, and compile comments. The highly technical nature of the subject, irregular summer schedules of many stakeholders, and the decision to hold no hearings outside of Nevada underscore the need for the comment period to be extended.

As evidenced by the overwhelming participation in the comment period on the original Draft Environmental Impact Statement, the public is intensely interested in the Yucca Mountain Project proceedings. To artificially restrict input on the Supplement by providing inadequate time for public comment further discredits the Department's process for evaluating the repository proposal. |

People Against Radioactive Dumping is a national, non-profit, consumer advocacy organization that has been active since 1971. PARD represents the 25,000 signators in San Bernardino County, CA and Mohave County, Arizona who have signed our petitions to government urging policy for the responsible management of radioactive materials. Thank you for considering our request.