

GE Stockholders' Alliance

for a sustainable nuclear-free future

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Re: Supplement to Draft EIS for Proposed Yucca Mountain Repository

Dear Ms Summerson:

Thank you for the opportunity to comment on the Supplement to the Draft EIS for the Proposed Yucca Mountain Repository for high level radioactive waste.

Even after reviewing the material you sent us, we still have deep reservations about the wisdom of proceeding with this plan. There are still a number of issues this plan does not address. We believe it underestimates the risks, and places too much faith in unproven technology. We believe the seismic activity in the area, alone, is enough to rule out Yucca Mt. as a repository site. We still believe it is not in the public interest to transport lethal high level radioactive waste from all over the U.S., to converge in one location that we believe to be unsuitable geologically. It is also illegal and improper to impose this on Native Americans who own the property and whose rights this violates. Specific comments follow:

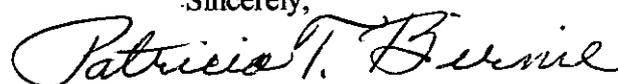
- Water Concerns. The Repository and the various operations necessary will require large amounts of water, and generate large amounts of contaminated water. Because the state of Nevada has scarce water supplies and has denied the water-use permit for the project, the DOE needs to address this critical concern, and explore alternate sources. The fuel blending concept could require huge amounts of water for its inventory pools. But little is said about the water source, water treatment, handling of contaminated water, and safety measures planned. Earthquakes could also cause unpredictable damage to the inventory pools. In addition, severe storm flooding (rare, but historically has happened) could carry radiation-contaminated water into nearby rivers to pollute water supplies to hundreds of thousands of people downstream. Above ground dry cask storage would likely have a more immediate effect of contaminating the surface water. What would be the effects of a possible accident at the dry cask area (especially if leaky canisters are involved)?
- New Technologies of Fuel Blending and also Waste Package and Drip Shield Design. Because the new concept of fuel blending, mixing and re-packaging wastes has huge risks involved, the public needs to know more.

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- 5 cont about the technology to be assured that the proposed plan is adequate for safety and health of workers
and the general public. There was little description of this aspect of the plan. We need to be able to
6 review these techniques as used elsewhere, and learn what risks are involved, and what safety
measures need to be included in the plan. | The same is true of the titanium drip shield and whether the
Alloy 22 can perform the needed functions for an extended time. Is the 20 year track record enough to
give assurances of long term stability. |
- 7 3. Seismic Concerns. | Yucca Mountain is in the 3rd most active earthquake zone in the United States. We
believe the effects of possible earthquakes have not been adequately studied, in relation to causing
seepage in the underground repository, disrupting the inventory pools, or disrupting the 200 acre
above-ground storage facility for 4500 dry casks. In fact, there have been no site suitability studies for
the above-ground storage facility. |
- 8 4. Transportation Concerns. | We believe it is imperative that the DOE also hold hearings nationwide
about how the radioactive waste would be shipped to Yucca Mt. We believe it is irresponsible to
create another radioactive waste site (Yucca Mt.) in addition to all the other contaminated sites in the
9 U.S. It is further irresponsible to put the public at risk along the transportation routes, where rail or
highway accidents are frequent. | If the Repository is authorized, we strongly recommend that all
radioactive waste should remain on site, where it is generated, at least 50 years to "cool down" so that
the transportation risks would be reduced. This would also reduce the need for above-ground storage
facility at Yucca Mt. |
- 10 5. Public Input. | Because Yucca Mountain would be a taxpayer-funded operation, it is in the interest of
the public everywhere that public hearings be scheduled in locations not only near Yucca Mt. but also
many other locations across the country. |
- 11 6. Premature. | It appears that the repository design is in flux, or still evolving. Therefore it seems that
public review is premature. While we understand there is enormous pressure from the utilities for an
immediate away-from-reactor repository, it does seem logical that the public will be best served if all
due caution is followed, to make sure the science and technology are the best available. It would be
tragic to discover errors after tons of radioactive waste have been stored, then have to move them to
yet another location that may be chosen in the future. |
- 12 7. Policy. | The DOE will have a much smaller headache if the DOE required the cessation of all
processes that generate radioactive waste as soon as possible. | And as a matter of policy, the public
would respect the DOE's choice of repository location to be on U.S.-owned property, and not to be
13 violating yet another round of treaties with Native American peoples. |

Sincerely,



Patricia T. Birnie, Chair