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July 3, 2001

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Dr. Jane Summerson
EIS Document Manager
M/S 010
US Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
PO Box 30307
North Las Vegas, Nevada 89036

RE: Comments to Yucca Mountain Supplement to the Draft EIS for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nevada

Dear Dr. Summerson,

Thank you for the opportunity to comment on the Supplement to the Draft Environmental Impact Statement. The following comments should be considered in addition to those already submitted by Esmeralda County for the Draft Environmental Impact Statement.

Of particular concern to the people of Esmeralda County is the need for the DOE to work with the County on developing mitigation measures that will help to minimize the impacts associated with transportation to Yucca Mountain. DOE has not conducted the necessary transportation planning work required for Esmeralda County to fully understand the scope of transportation related environmental impacts.

1. Esmeralda County does not have the trained personnel, resources, or communications capability to handle a radioactive emergency. In accordance with NEPA, the Department should develop specific measures to mitigate all impacts associated with a nuclear waste repository at Yucca Mountain.

2. 1. The DOE has identified additional impacts based on the S & ER flexible repository design, but has not identified specific measures to mitigate these impacts. Specific measures the DOE will take to minimize new impacts identified in the SDEIS, as well as impacts from the transportation of radioactive waste, should be addressed in detail in the SDEIS.

- 3 2. The Final EIS is scheduled for release in December, but the DOE has not identified transportation modes or routes in Nevada that would be used to haul waste to Yucca Mountain. The broad range of impacts from numerous possible transportation routes/modes coupled with the broad range of impacts from temperature flexibility makes commenting and assessing impacts from Yucca Mountain as they relate to Esmeralda County difficult.
- 4 3. In Section 2.2, "Overview of Design Evolution," the DOE states "the design will continue to evolve in response to additional site characterization information, technological developments, and interactions with oversight agencies." Because there is no time frame attached to this statement, we can assume that the DOE will make design changes right up to the point of construction. The new range of impacts associated with the flexible design led to the development and release of a supplemental DEIS. Yet, the SDEIS offers no explanation as to how additional impacts from ongoing design changes will be addressed from the time the final EIS is released to the point when construction would begin.
- 5 4. The SDEIS should consider locating required off-site manufacturing plants for drip shields, waste packages, and emplacement pallets in Esmeralda County.
- 6 5. The low-temperature scenario is intended to improve the long-term performance of the repository and reduce geologic uncertainties, but would result in greater transportation risks, including a higher traffic fatality rate, due to an increased distance/number of shipments to the repository. The SDEIS should offer mitigation measures to help minimize the increased transportation risk.
- 7 6. In Section 3.1.6, "Socioeconomics," the SDEIS does not adequately address negative impacts to local economies if workers are drawn away from small communities to work at the Test Site. The tax base and real estate values in a small mining community such as Goldfield could suffer.
- 8 7. In Section 3.1.14, "Transportation," the SDEIS states that "transportation of spent nuclear fuel and high-level radioactive waste to the repository would not be affected by the repository design evolution." It is impossible to predict whether transportation would be affected because the design has not been finalized. Therefore, the relationship of design evolution to transportation parameters is unknown.

Please feel free to contact me should you have any questions regarding these comments.

Sincerely,



Ben Viljoen
Chairman