STAR foundation
TRUTH ABOUT RADIATION

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Dr. Jane Summerson,
EIS Document Manager, U.S. DOE
Yucca Mountain Site Characterization Office
P.O. Box 30307
North Las Vegas, Nevada, 89036-0307

Dear Dr. Summerson:

1 The STAR foundation is extremely opposed to the selection of the Yucca Mountain, Nevada site for development as a permanent repository for high-level nuclear waste. We believe that the DOE cannot guarantee the safety of this facility and that groundwater problems are not given adequate attention by the EIS. Furthermore, we feel strongly that the location of Yucca Mountain in an area with potential for such dramatic seismic activity is ludicrous.

The Yucca Mountain Project, if approved, would launch 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.

2 We believe that DOE is rushing to recommend Yucca Mountain for development as a nuclear repository, with many concerns remaining about the suitability of site itself. 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
3 respond.

4 Transporting high-level nuclear waste is inherently dangerous because it elevates the risk of radiological release and disperses this risk along transportation routes where our emergency response personnel may
5 lack the training and equipment necessary to respond effectively to a radiological accident. Yet the Draft Environmental Impact Statement for the Yucca Mountain Project deals inadequately with the transportation scenario. For example, the DOE has not specified which routes would be used for Yucca
6 Mountain shipments or whether the waste would travel by train or by truck, and has not identified a clear process for making these decisions. The canisters that would be used to transport nuclear waste to
7 Yucca Mountain have not been subjected to physical testing, and computer models rely on outdated testing parameters. Unanswered questions remain about the risk of sabotage and liability in the case of
8 an accident. Even without an accident, nuclear waste transportation canisters routinely emit the
9 equivalent of one chest x-ray per hour of harmful radiation. Also, property values have been shown to decline along nuclear waste shipment routes.

We urge you to withhold support for the Yucca Mountain repository proposal until these concerns have been addressed and the feasibility of transporting nuclear waste to Nevada has been adequately assessed.

Sincerely,

Scott Cullen
Counsel

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