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Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
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Dear Dr. Summerson:

1 In reading the supplementary report by the engineers on the Yucca Repository, we failed to find a description of the open pool that we have learned would be used for the cooling of spent nuclear waste(2.3.2.1.) North Portal Operating Area, Figure 2-5. We have also found detailed information about the plan to cover a 200 acre parking lot with asphalt for above-ground fuel storage. These intentions represent potential hazards that are not addressed adequately in the report and they need to be considered in the planning for such a facility.

Intensive studies must be conducted on the impacts to surface water and storm run-off from the above-ground cooling ponds and waste canisters, as well as evaporative ponds. This is completely different from the impacts of deep geological storage previously studied. These potential hazards also call into serious question the wisdom in the planning for the total project.

Flooding

2 A recent USGS study of storm run-off from the Test Site and the Yucca Mountain site area indicates immediate flow into our Amargosa River from moderate to heavy rains. Non-residents do not understand that although this is a very dry region, rainfall can and does cause severe flooding periodically. The DEIS and the supplement do not address the critical issue of flooding adequately. The EIS documents to date do not take sufficient cognizance of the local knowledge of floods and earthquakes in the general area. The following are verbatim accounts from some older residents.

Marta Becker, the co-owner of The Amargosa Opera House at Death Valley Junction, has told of a flood that had occurred before her purchase of the theater in the 1960's. She acquired the property, as it was, after the flood and she reported that the high water mark from the flood on the wall inside the theater was three feet above ground level. The flow from such a flood would follow the Amargosa Valley and the Amargosa River to the eventual destination in the flat in Badwater, Death Valley, traversing three counties, Nevada's Nye County, and California's Inyo and San Bernadino Counties.

Two retired residents of the Tecopa/Shoshone area have recalled at least three occasions in the last thirty years in which a deluge forced the complete closing of all roads leading into these communities. In one recorded instance, Shoshone was isolated for over a week

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because of the flood and washed-out roads. Emergency services was required to fly in dry ice in order to preserve the necessary food supplies for the community.

A member of the board of directors of Friends of Tecopa Hot Springs formerly operated a transport by which he delivered supplies locally. He recounts that, on a number of occasions highway 127 was impassable where it crosses the Amargosa River. This floodwater originates in the Yucca Mountain area and joins with all other water collected along the river's path. Out-of-state professional engineers should know that floods of catastrophic proportions do occur in this area and may very well have been unreported because of the remoteness. The dangers to local residents and the environment from radiological contamination could be severe.

Earthquakes

3 The engineers recognize the hazards of a moderate earthquake, but they fail to recognize the possibility of a quake of the magnitude of the disastrous one that occurred in the Owens Valley in 1872. Hundreds of people died there and practically all structures were destroyed, including the Inyo County courthouse. John Muir, standing on the valley floor in Yosemite, when the quake struck, said words to the effect that it was like observing Creation's beginning.

4 Such natural phenomena do occur in this region and the consequences can be beyond the control of mere man. Forecasting contingencies for 10,000 years presumes knowledge and control of events beyond what we possess. It also presumes that all succeeding generations and cultures will be capable of dealing with the all of the possible contingencies. Before the DOE proceeds with further planning and construction we strongly recommend exploration of the local knowledge of natural phenomena and disasters that have occurred and surely will continue.

Yours truly, *Clifford A. Kenny*

Clifford A. Kenny,
Vice- President, Friends of Tecopa Hot Springs, Inc.