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# CLEAN WATER ACTION ALLIANCE

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Dr. Jane R. Summerson, EIS Document Manager  
M/S 010  
Office of Civilian Radioactive Waste Management  
Yucca Mountain Site Characterization Office  
US Department of Energy  
PO Box 30307  
North Las Vegas, Nevada 89036-0307

Dear Jane:

We are pleased to offer comments on the DEIS for the nuclear waste repository at Yucca Mountain for Clean Water Action Alliance of Minnesota (CWAA).

CWAA has approximately 52,000 members in the state of Minnesota. We worked aggressively to prevent the storage of high-level nuclear waste outside of Northern States Power (NSP) Company's Prairie Island facility. We argued that, despite the claims of the utility that storage would be temporary, it would be stored there permanently. We have serious concerns about several aspects of the Yucca Mountain Project, which we outlined in our initial comments in February of 2000.

1 We are currently unable to provide substantive comments on the Supplemental DEIS due to the technical nature of the information and the extremely short comment period. We are deeply concerned that the hearings on this project have been so limited and have not included Minnesota. Our state currently stores nuclear waste at one of the power plants which is running out of storage and pushing the timeline for this project.

2 We believe this project has too many flaws to move forward. The idea of storing  
3 nuclear waste in a earthquake zone is ludicrous. In addition, we are alarmed by the EPA's willingness to lower water standards so this project can be approved. It appears that there are still many unanswered questions, a lack of information and uncertainties about this project.

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4 | Clean Water Action Alliance is committed to Environmental Justice. We believe  
 5 | that this project unfairly targets Indigenous Peoples for long-term nuclear waste  
 storage. The use of Yucca Mountain violates Western Shoshone Treaty. | Section  
 3.1.1 talks about how DOE would obtain "permanent control" of the land  
 surrounding the repository site, yet makes no mention of how it plans to "own"  
 that area. The area in question (in fact all of Yucca Mountain, or *Newe Sogobia* as  
 the Shoshone refer to it) is part of the Western Shoshone Nation, who oppose this  
 project. The Nuclear Regulatory Commission requires DOE to prove ownership  
 of the lands it plans to use, yet the DOE does not have ownership, only control. |

Sincerely,

Diana S. McKeown  
 Energy Program Coordinator  
 Clean Water Action Alliance