Att. Possible Site Recommendation for Yucca Mountain (Public Comments)

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Carol Hanlon
U.S. Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office, M/S #25
P.O. Box 30307
North Las Vegas, NV 89036-0307

1-800-967-3477 , Voice

RE: Public comments in regards to the "Yucca Mountain Science and Engineering Report: Technical Information Supporting Site Recommendation Consideration" (DOE/RW-0539), May 2001 (S&ER).

Dear Ms. Hanlon:

Thank you for this opportunity to comment on the Yucca Mountain Science and Engineering Report (S&ER). Clearly, a great deal of work has been applied to this report. I hope some of the quality in it shows up in the Final EIS report.

Section 1.2.2.2 Environmental Radiation Protection Standards for Yucca Mountain

40 CFR 197.35, Subpart B should not be utilized unless the specified point of compliance falls no more than five kilometers from the edge of the repository block for the next one-million years. The inadvertent human intrusion requirement, contained in 40 CFR 197.25, Subpart B, should not be utilized if it tries to predict events more that 500 years in the future.

Figure 1-5, page 1-21

1 The boundary line coordinate points of the Proposed Land Withdrawal Area should be provided in the FEIS. Those coordinates should be provided in the Nevada State Plane, Central, Datum: NAD 27 and in universal coordinates that are specified in degrees.

Figure 1-6., page 1-22

The portions of the Desert National Wildlife Refuge that remain within the light green area should be displayed on future maps.
2 An appendix in the FEIS should provide the formal legal description of the Nevada Test Site boundaries as well as the legal description of the presently configured Nellis Air Force Range.

Figure 1-8., page 1-26

The political boundaries on this map need to be updated. Some of the boundaries were changed over 1 1/2 years ago.
Refer to Pub.L. 106-65, Div. B, Title XXX, Subtitle A, §§ 3011(b), Oct. 5, 1999, 113 Stat. 886. The political boundaries should be consistent with the political boundaries on the preceding maps.

Conclusion

The S&ER clearly shows that an enormous amount of research, costing a great deal of money, has been sunk into the Yucca Mountain characterization and repository design studies. This has involved thousands of researchers and contract personnel who are now likely to be supportive of seen the fruits of their labors realized in the form of an operational repository. Obviously, the design involves a massive engineering project that rivals numerous other recent projects. Looking over the vast array of conceptual studies, makes me wonder if many of the proponents might get lost in all the technical intricacies and fail to see the whole picture, including that unforeseen problems may emerge as many of the conceptual technologies are brought together.

Past and present DOE embarrassments should be remembered and taken into account. For example, the Superconducting Super Collider (SSC) project in Texas costs escalated to many billions of dollars before it was canceled. The National Ignition Facility (NIF) appears to be headed in the same direction. Could Yucca Mountain be next?

I am glad to see many of the research details finally emerge but now the public has been left with only a brief period of time to digest the highly technical findings, and designs, before the DOE says it will rule on the recommendation of the project.

All public comments received should be published verbatim and distributed to the 37 public reading rooms listed in Appendix D.8 of the Draft EIS Supplement report. In the near future I hope that these comment will be made available on the Internet.

Sincerely,

Vernon J Brechin

Vernon Brechin

CC: Dr. Arjun Makhijani, President, IEER
Mr. Robert Loux, Executive Director, Nevada Agency for Nuclear Projects
The Honorable Kenny Guinn, Governor of Nevada
The Honorable Frankie Sue Del Papa, Attorney General of Nevada