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JRODERMATT@aol.com on 10/18/2001 11:53:04 PM

To: YMP_SR@ymp.gov
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senator@boxer.senate.gov, president@whitehouse.gov, vice.president@whitehouse.gov

Subject: Comments on Yucca Mountain DEIS and Supplemental DEIS

Part of Records Package / Supplement / Correction



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Dear Representative:

I am writing to express my concerns regarding the siting and construction of the proposed nuclear waste repository. I am against the designation of Yucca Mountain as a temporary or permanent nuclear waste repository. Public Comments on this the draft EIS was extended until October 19, 2001. There are a number of reasons for my opposition to the proposed project:

1. The site is geologically unsuitable for the very long term isolation of high level radioactive wastes.

The available geologic information clearly indicates that Yucca Mountain is comprised of fractured igneous rocks. Groundwater aquifers comprised of fractured igneous rocks do not offer significant natural attenuation for groundwater pollutants, including radioactive wastes. I believe the geological literature indicates that Nevada is located above some type of "tectonic spreading center" which accounts for the late Tertiary volcanism and tectonic deformation (low and high angle faulting) that has occurred during the Tertiary and Quaternary. These conditions do not assure me that long term stability of the proposed waste repository site is a given fact. Geologically speaking, we would be better off siting a nuclear waste repository in the Precambrian shield areas where long-term geologic stability is at least theoretically more feasible.

2. The proposed engineering methods and institutional controls proposed to achieve long-term waste isolation are woefully inadequate.

The waste containment facility at Yucca Mountain does not meet the minimum standards for isolation of hazardous wastes. I believe this opinion was previously relayed to you by Ms. Carol Browner (former Administrator of USEPA) regarding provisions of Senate bill S1271. The high level radioactive wastes proposed for disposal at Yucca Mountain will remain toxic long after the waste containment systems have failed! The incredibly long half lives of some of the isotopes in the wastes and the extreme physical conditions imposed upon the waste containment system will cause the failure of the system as a whole. The waste containment systems at hazardous waste sites commonly fail at some point, it is just a matter of time. The nuclear wastes will be toxic for a very, very, very, very... long time and a repository sited at Yucc

3. The public assurances of adequate site-specific waste isolation capabilities/procedures are based upon unreliable predictions from models with inherently large margins of uncertainty.

Models used to predict environmental behavior of waste constituents are notoriously unreliable for relatively short term predictions. From my work in the waste management and site cleanup businesses, I have experienced these problems firsthand at relatively small scale municipal solid waste landfills and hazardous wastes cleanup sites.

This problem is only compounded by the extremely long periods of time required for effective waste isolation at Yucca Mountain. In addition, the timeframe also calls into question potential effects from significant climate change issues in Nevada which cannot be accurately estimated at this time. When we look at the validity of the numerous assumptions and generalizations that must be included in those model predictions, it is difficult to

4. Transportation of high-level radioactive waste is a very risky business. Under normal

circumstances, the frequency of traffic accidents compounded with waste containment problems makes this a very significant problem. With the events of Sept. 11th firmly in our minds, I am sure that other possible scenarios can be envisioned that could have devastating consequences to our citizens. Terrorism has become a very real concern. Although I am not an expert in this area, I am confident that the DEIS does not adequately account for this possibility.

The people and representatives from the states of Nevada and California have given you a great deal of negative feedback on this project. From the limitations included in technical information that I am aware of, I believe that their fears are well founded and that the proposed waste repository should not be sited at Yucca Mountain.

Sincerely,

John R. Odermatt, M.Sc., B.Sc.
Geologist/Geochemist

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