

RRR000241

To: EIS\_Comments@ymp.gov

cc:

Subject: EIS Comment

User Filed as: Not Categorized in ERMS

January 10, 2008 21:11:24

IP address: 71.191.118.227

The Commentors Name: ---> Kevin J Kamps

\_\_\_\_\_\_

The Commentors Address:

---> 6930 Carroll Avenue, Suite 400

---> Takoma Park, Maryland 20912

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---> kevin@beyondnuclear.org

---> Add commentor to the mailing list : yes

~~~~~

Contact Information:

---> fax number :

---> phone number : 301 270 2209 ---> organization : Beyond Nuclear

---> position : Radioactive Waste Watchdog

Comment Text :

--> Please note that one additional organization was added onto the list of signatories of our previously submitted comments:

Lisa Rainwater, Ph.D. Policy Director Riverkeeper 828 South Broadway Tarrytown, NY 10591

An updated and complete version of our comments, then, is pasted in below. Thank you.

Kevin Kamps, Beyond Nuclear

Comments to DOE

re: the Draft Repository SEIS, Draft Nevada Rail Corridor SEIS, and Draft Rail Alignment EIS

DOE should extend the public comment period by 60 additional days, given that these environmental impact documents are a foot thick altogether. The public needs additional time to digest the proposals, analyses, and references, and to compare and contrast them with the three foot thick "Final" EIS published by DOE in 2002, in order to give meaningful comments.

Shipping tens of thousands of high-level radioactive waste trucks, trains, and barges through 45 states and the District of Columbia risks severe accidents and terrorist attacks. This could release catastrophic amounts of deadly radioactivity in major population centers. These waste transports would represent potential Mobile Chernobyls and dirty bombs on wheels rolling past the homes of millions of Americans. Each truck cask of irradiated nuclear fuel would contain 350,000 curies of radioactive cesium and strontium, or about 20 to 30 times the amount of these harmful fission products released by the Hiroshima atomic bomb. Every dedicated train hauling three or four rail casks would contain more radioactive cesium-137 than the total amount released during the Chernobyl nuclear catastrophe. DOE must integrate into its Yucca Mountain transport analysis its own proposals, under the Bush administration's "Global Nuclear Energy Partnership" (GNEP), for waste imports from overseas, and waste shipments to reprocessing (plutonium extraction) centers in the U.S. before waste shipments to Yucca for final disposal. DOE must also analyze the increased transport risks from its proposal to nearly double the amount of waste to be buried at Yucca to 130,000 metric tons - which on its face violates the Nuclear Waste Policy Act, as amended, which limits the amount of waste that could be buried at the first repository to 70,000 metric tons, at least until a second repository is opened in another state.

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traditional ceremonies have continued to be conducted right up to recent years, DOE should terminate the Yucca Mountain Project for this reason alone. The United Nations Committee on the Elimination of Racial Discrimination ruled in recent years that the Yucca Mountain Project represents a human rights violation against the indigenous Western Shoshone Nation, and has urged the U.S. government to cease and desist its activities there. The Yucca Mountain dump proposal represents blatant environmental racism, as stated by Ian Zabarte of the Western Shoshone National Council at DOE's recent Las Vegas and Washington, D.C. hearings.

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White House. The National Academy of Science reported recently, in its Seventh Biological Effects of Ionizing Radiation (BEIR) report, that any dose of radiation, no matter how small, carries a health risk, and that in fact those risks at low doses are disproportionately high, significantly higher than previously reported. DOE has engaged with the U.S. Environmental Protection Agency and the Nuclear Regulatory Commission, in secretive behind closed door meetings, to play a game of "hide the ball" from the public. All agencies, including DOE, must stop using statistical manipulations to hide the actual levels of radiation dose exposure and consequent health impacts that vulnerable individuals and populations downstream and downwind of the proposed Yucca Mountain dump would suffer over the next million years. DOE should stop using "Standard or Reference Man" (analyzing radiation dose health impacts on a young, healthy adult white male) and instead use "Standard or Reference Pregnant Woman." DOE should analyze the health impacts of Yucca's radioactive waste leakage into the drinking water supply below on the most vulnerable individuals and populations downstream, including pregnant women, fetuses, infants, children, the elderly, others with compromised immune systems, as well as Western Shoshone Indians living traditional lifestyles and subsistence farmers living downstream in the future, and persons consuming foodstuffs (such as dairy products) grown nearby Yucca but exported elsewhere.

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Nearly 1,000 environmental, public interest, consumer, and taxpayer organizations, as well as many cities, counties and even states -representing many millions of Americans -- have expressed opposition to various aspects of the Yucca Mountain dump proposal over the past twenty years. DOE should declare the Yucca Mountain site unsuitable, terminate the project, return the land to its prior condition, and seek guidance from Congress and the President on next steps for addressing the nuclear waste dilemma, as provided for in the Nuclear Waste Policy Act, as amended. DOE should heed the call by 150+ groups across the U.S., that high-level radioactive wastes stored on-site at reactors be safeguarded and secured against accidents, attacks, and leakage until a scientifically sound and socially acceptable long term waste management plan is arrived at through democratic and just means. The one to two million dollars per day being wasted at the dead end Yucca Mountain Project should be immediately re-directed to securing and safeguarding on-site waste storage at reactors, that will inevitably remain in place for decades to come. Submitted to DOE on Jan. 10, 2008 by

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On behalf of the following organizations:

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Arnold Gore Consumers Health Freedom Coalition New York City

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Kat Logan Smith Executive Director Missouri Coalition for the Environment St. Louis, MO

Gabriela Bulisova Artists Against Nukes One Austin Place Takoma Park, MD 20912

Lisa Rainwater, Ph.D. Policy Director Riverkeeper 828 South Broadway Tarrytown, NY 10591



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The Commentors Name: ---> Kevin J Kamps

The Commentors Address:

---> 6930 Carroll Avenue, Suite 400

---> Takoma Park, Maryland 20912

Email Information:

---> kevin@beyondnuclear.org

---> Add commentor to the mailing list : yes

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Contact Information:

---> fax number :

---> phone number : 301 270 2209

---> organization : Beyond Nuclear

---> position : Radioactive Waste Watchdog

Comment Text :

--> Please note that the following individuals also endorse our previously submitted comments:

Shana Schwartzberg Brayton 670 Bryants Nursery Rd. Silver Spring, MD 20905

Carol Ann Goldstein San Diego, CA 92122

Mark Oldland 13048 Twin Star Ln. Grass Valley, CA 95949

Marci De Sart Brunswick, GA 31525

Pauline A. Wolf, Finley ND

Tovah D. Wolf, Grand Forks ND

Ariel C. Wolf, Grand Marais, MN

Kiira T. Wolf, Joplin, Missouri

The comments, signed by these individuals, follows. Thank you.

Kevin Kamps, Beyond Nuclear

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re: the Draft Repository SEIS, Draft Nevada Rail Corridor SEIS, and Draft Rail Alignment EIS

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