Nancy Givens <nancy.givens@wku.edu> on 01/04/2008 02:11:56 PM

To: EIS_Office@ymp.gov
cc:
Subject: Public Comment on Yucca Mountain Nuclear Waste Storage Project

LSN: Relevant - Not Privileged
User Filed as: Excl/AdminMgmt-14-4/QA:N/A

To Whom it May Concern,
I am writing to comment on the proposed Yucca Mountain High-Level Nuclear Waste Storage Project. In addition to being a Shoshone Indian sacred site, Yucca Mountain is only 90 miles from Las Vegas, NV, the fastest growing city in the nation, and 12 miles from the farming community of Amargosa Valley, home to the largest dairy farm in Nevada, which provides milk to the entire southwest. Groundwater from Yucca Mountain eventually finds its way to numerous natural springs in the region. This includes Death Valley, CA, 20 miles away, home of Timbisha Shoshone and visited annually by up to a million thirsty tourists.

1 All tribal governments of the region oppose the Yucca Mountain Project. Of particular importance is the 1983 Treaty of Ruby Valley, still in force between the Western Shoshone Nation and the United States. The treaty outlines Western Shoshone land, "Newe Sogobia," which includes Yucca Mountain. Newe Sogobia has been declared "nuclear free" by the Western Shoshone National Council. Thus, the Yucca Mountain Project violates Shoshone sovereignty and law. The United States must honor this treaty and follow the United Nations Committee to Eliminate Racial Discrimination (CERD) direction to "freeze, desist and stop" actions against the Western Shoshone Nation, including the Yucca Mountain project.

2 Moreover, Yucca Mountain is not scientifically suitable. Over 25 years of analysis of Yucca Mountain has revealed significant problems with the site.
1. The region is seismically active, and the rock is highly fractured, which allows a "fast" pathway for water to escape. According to the DOE's own analysis, radioactive water could reach drinking wells in 200 to 400 years.
2. As a result, the DOE has moved away from a cornerstone of the original law- that the site alone provide primary geological waste isolation. In order for the project to move forward, regulations have been changed or eliminated to accommodate deficiencies of the site. Now, 99.9% of the waste containment system in the long term would be unverifiable metal canisters and drip shields.
3. The combination of readily available water inside the mountain and an oxidizing geochemical environment makes Yucca Mountain quite corrosive, leaving great uncertainty as to whether the waste could be contained for the hundreds of thousands of years that it will be toxic.

3 But this only addresses the waste once it's there. Also of huge concern is that planned nuclear waste shipments to Yucca Mountain for just one year would outnumber all such shipments made over the past
4 three decades in the U.S. Anticipated problems:
1. Shipments would cause cumulative "routine" radiation exposures to the public, and reduction in property 5
values near transportation routes.
6 2. Large expenditures would be required to upgrade highway and rail routes, build and test new shipping containers, and train emergency response personnel nationwide.
(continued) 3. Approximately 50 million people in 44 states would live within the potential exposure zone.
4. By the DOE's own analysis, 150-400 accidents are expected over the 20-30 year period of shipping, (depending on the method of transportation and routing, -which has not yet been finalized). A 10/07
7 Supplemental Environmental Impact Statement discusses rail routes.
5. In the case of a serious accident from the projected 50,000 or more shipments, dozens of people could die immediately, others could be seriously injured, and cleanup alone would cost tens of billions of dollars and take months or years to complete. This does not include the millions to billions of dollars lost to the local economy from the stigma of being contaminated.

8 [What should be done instead? Every active nuclear reactor will continue to be a waste site, since the waste needs to be cooled underwater for an average of 5 years before it can be moved. Thus, the Yucca Mountain Project does not fully address the significant environmental and public health risks that spent-fuel pools pose to surrounding reactor communities. The waste should be stored as near as possible to the sources of generation in Hardened On-Site Storage (HOSS). It can be then be managed for 100–200 years while some of the most radioactive elements such as strontium-90 decay away, allowing the waste to be less dangerous to handle in the long term.]

9 [Nevadans, the congressional delegation, the governor, and the legislature all continue to reject a nuclear dump at Yucca Mt.
Furthermore, there is no radiation protection standard for Yucca Mountain yet, which is necessary for the project to move forward. Federal court ruled the initial standard inadequate. Despite repeated delays, budget shortfalls, changing management, and controversy regarding potentially falsified science, DOE continues to forge ahead. Even NRC commissioner Edward McGaffigan, retiring after 10 years, has said, "It may be time to stop digging ..." [at Yucca], and that the project has been undermined by "bad law, bad regulatory policy, bad personnel policy...bad budget policy" and other problems "throughout its history."

These words say it all. This project should be dropped permanently for the many reasons listed above. Thank you for the opportunity to comment.]