



Alice Bartholomew <aiw777@yahoo.com> on 01/05/2008 04:57:22 PM

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To: EIS\_Office@ymp.gov  
cc:  
Subject: Oppose Yucca Mountain as High Level Radioactive Waste dump

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To: **EIS Office U.S. Department of Energy Office of Civilian Radioactive Waste Mgmt**

1 [ I am writing to STILL oppose Yucca Mountain being used as a High Level Radioactive Waste dump. I have written many times before and absolutely have not changed my mind one iota about the danger of this project to all of us. ]

I understand:

2 [ # that Yucca Mountain is located near fast growing populations; the State's largest dairy, providing milk all the way to Los Angeles, shares the aquifer with Amargosa Valley. ]

3 [ # is within the treaty lands of the Western Shoshone nation, ratified by Congress in 1863 and recently upheld by the UN Committee to End Racial Discrimination, naming the Yucca Mt. Project as part of ongoing human rights violation against the Western Shoshone. ]

A [ # experiences rain as flash floods that travel rapidly so that any escaping radionuclides that reach the surface can travel down the Amargosa River channel. Climate conditions also appear to be changing rapidly and a high-level nuclear waste repository must be able to isolate the waste for hundreds of thousands of years. Throughout the lifetime of the waste, the region is expected to experience future climate cycles that would include ice ages and wetter conditions. ]

5 [ # groundwater beneath Yucca Mountain flows into a "closed" hydrogeologic basin that covers thousands of square miles, and is inhabited by many communities, the Timbisha Shoshone Tribe, and Death Valley National Park, visited by nearly 1 million visitors a year, all of whom rely on groundwater for survival. The Amargosa River, which is fed by all pathways on both sides of Yucca Mt., is considered the third largest in the western U.S. and parts of it run year round above ground. Research conducted by Inyo County, CA, defines fast pathways from Yucca Mt. to area springs used for drinking water by many. ]

6 [ In regard to the altered design of Transportation, Aging and Disposal (TAD) Canisters:  
# instead of reducing the need for extensive SNF handling facilities, the result is to transfer risks and impacts from the repository to the reactor locations where the handling operations would take place. The final SEIS needs to comprehensively assess risks and impacts to workers, facilities, communities and the environment at all of the reactor locations where TADs would have to be used.  
# TADs also complicate waste transportation. Many reactor sites already have (or are in the process of implementing) on site dry storage facilities using multipurpose (storage/transport) container systems that are not compatible with TADs and would

require either repackaging of the SNF into TADs prior to transport or the use of non-standard transport vehicles.

# TADs can only be shipped via rail or by very large, oversized/heavy-haul trucks. Because rail access is NOT available at Yucca Mountain, and there is not guarantee it ever will be, the SEIS needs to assess the impacts of a TAD based transportation system that can not use rail as the primary mode of transportation to Yucca.

# as there are no final TAD designs in the draft SEIS, so it is difficult to assess how TADs will impact the repository system, including the transportation components.

# costs and financial arrangements for the use of TADs are unknown.

# the proposed TAD system is not compatible with dry storage systems currently in use at civilian nuclear power plants.

# many utilities have specific problems with use of the proposed TAD system at specific reactor sites.

# DOE offers no meaningful alternative to the proposed TAD canister system. ]

7 [ In regard to the Mina Rail Corridor as a "non-preferred alternative:

# NEPA requires that alternative evaluated in an EIS be capable of being selected -i.e., they must be viable alternatives. Because the Walker River Paiute Tribe has refused permission for DOE to use any portion of its reservation for the proposed rail spur (and without such permission the Mina route cannot be used), it is inappropriate for DOE to have included Mina as an alternative for comparing rail corridors in the draft EIS. The Mina route is not viable and needs to be excluded from the EIS. ]

8 [ # the Rail DEIS No Action Alternative is also inappropriate and perhaps unlawful. If DOE does not select the Caliente or Mina rail alignment, the DEIS states that the future course "is uncertain." In fact, if rail access to Yucca Mountain is not implemented, the NO Action alternative would be legal-weight truck shipments.

# the repository SEIS needs to evaluate the impacts of a legal-weight truck transport system nationwide and within Nevada. ]

9 [ DSEIS does Not Adequately Address Transportation Safety and Security:

□# It does not consider worst case accidents - such combinations of factors "are not reasonably foreseeable".

# underestimates consequences of severe accidents involving long duration fires. ]

10 [ # underestimates consequences of terrorist attack.

# dismisses potential for human error to exacerbate consequences of accidents or terrorist attacks.

# dismisses potential for unique local conditions to exacerbate consequences of accidents or terrorist attacks ]

11 [ # rail DEIS does not fully evaluate repository shipments into NV from CA or the impacts to Northern Nevada (especially the Reno/Sparks/Washoe County area.

# incomplete planning for rail shipments by rail/truck. ]

Also:

12 [ □# DOE's selection of the Caliente Corridor is not supported by the information presented in the Draft SEIS - the information in the DEIS does not adequately compare Caliente with

- other viable rail corridors. ]
- 13 [ # DOE's study of the Mina Corridor as a "non-preferred alternative" is not warranted given the Walker River Paiute Tribal Council's withdrawal of support. ]
- 14 [ # [ ] Because DOE has now announced that the rail line it proposes would be a "Shared Use" line, the USDOT Surface Transportation Board needs to be the lead agency that prepares the Rail Alignment EIS. ]
- 15 [ # the DOE contention that non-rail shipments would be made by over-weight trucks is unsubstantiated, and the impacts of the use of overweight truck in Nevada and elsewhere are not analyzed. ]

Please do not allow Yucca Mountain to be a High Level Radioactive Waste dump for the sake of ourselves and future generations. We need to find a secure, safe dump and it is not Yucca Mountain.

This whole dilemma illustrates the need to stop even considering nuclear energy and turn our attention and talents to developing clean renewable energy such as wind and solar.

Thank you.

Sincerely,

Alice Bartholomew  
415 Wall Street  
'Elmira, NY 14905

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