



RRR000540

To: <EIS_Office@ymp.gov>
cc:
Subject: Yucca Mountain Comment

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I am writing to oppose turning Yucca Mountain into a nuclear waste depository for the following reasons:

- 1 [1. It would once again screw the Native Americans.
I've seen what's happened on the Navajo reservations--the extremely high incidence of birth defects, the contamination of the environment and the violation, once again, of our contracts with this land's older peoples. Yucca Mountain is on stolen Western Shoshone land. The US has never shown legal title to this land, even when requested by federal and international courts.]
- 2 [2. There is a great danger of groundwater contamination.
Because of the topography of the area, groundwater moves rapidly down through the site. Tracers from atmospheric nuclear weapons tests have been found at the underground level at which waste would be placed. This means that precipitation on the surface can reach the waste in less than 50 years, then carry the radioactive material using the groundwater in as little as possibly a few hundred years. Yucca Mountain scientists will readily tell you that the question is not if the repository will release its contents, but when.
- 3 [3. Even if you don't care about the Shoshone, it would endanger millions of other people.
The groundwater that is downstream from the site is used for drinking, irrigation, and the largest dairy in the Nevada, supplying thousands of children with milk. Seventeen miles away, California hosts 1.4 million tourists a year going to Death Valley. Seven tributaries flow down Yucca Mountain to the underground Amargosa River, said by some to be the longest and biggest in the world. The Amargosa empties into Death Valley, after flowing right through a number of towns.]
- 4 [4. It would violate the Nuclear Waste Policy Act.
The Nuclear Waste Policy Act requires that geology be the primary barrier to radioactive contamination. This is not possible at Yucca Mountain, so the DOE's design depends on an engineered barrier of unproven durability. The State of Nevada has filed suit against DOE claiming this is a violation of the Nuclear Waste Policy Act requirement for geologic isolation.]
- 5 [5. Insufficient data exists to evaluate waste containers.
The Department of Energy is proposing to place the waste in "corrosion resistant" metal containers, which it claims will contain the wastes for more than 10,000 years, the duration of the regulatory period set by the EPA and Nuclear Regulatory Commission. The wastes remain hazardous for hundreds of thousands of years. The claim of corrosion resistance is based on about 2 years of lab experiments under conditions less severe than would be expected

in the repository, and then these corrosion results have been extrapolated for the thousands of years of containment necessary. Other sites have experienced leaks from similar corrosion-resistant containers, so it's safe to say this site would be no different.

6. It is an active earthquake zone, with 33 faults on site.

Yucca Mountain is the third most seismically active area in the continental US (after Alaska and coastal California). In the past 20 years, there have been over 600 earthquakes within 50 miles, with the largest, in 1992, causing \$1.4 million in damage to DOE's Yucca Mountain field office. The site is not earthquake proof, nor can it be made so.]

7. Studies are inadequate and incomplete

The Yucca Mountain studies and site recommendation have been called inadequate and/or incomplete by the General Accounting Office, the Nuclear Regulatory Commission, the U.S. Nuclear Waste Technical Review Board and several international peer review panels. The DOE still has at least 293 studies of site and design factors that it has agreed to complete before it submits a license application to the Nuclear Regulatory Commission. The Nuclear Waste Policy Act requires that site characterization be complete at the time of a site recommendation (Feb. 14th, 2002) and that the license application must be submitted within 90 days of site designation. However, the DOE's Yucca Mountain Management and Operating contractor has estimated that it will take 4 years to complete these studies.]

Please include my objections in the comments on this action

Sincerely,

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