

Exec-2008-000632

**The Secretary**

**From:** Iona Chelette [REDACTED]  
**Sent:** Friday, January 11, 2008 3:34 AM  
**To:** The Secretary  
**Subject:** Yucca Mountain Comments

RRR000550

Please identify me by my home address, 61996 Sunburst Circle, Joshua Tree CA 92252-2622 on the record and do not publish either my email address or my unlisted home telephone number provided below for your reference. Thank you for your consideration.

10 January 2008

U.S. Department of Energy  
Office of Civilian Radioactive Waste Management Yucca Mountain Site Characterization  
Office P.O. Box 30307  
North Las Vegas, Nevada 89036-0306  
1/11/08 WITH ENCLOSURE

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Comments on Yucca Mountain Project Supplements EIS DOE/EIS0250F-S1D and DOE/EIS-0369D

Ladies and Gentlemen:

Introduction

The fatal flaw in the proposed geologic repository for nuclear waste at Yucca Mountain, Nevada is a failure to adequately address its probable cumulative impacts. Inadequate monitoring is proposed; the storage capacity for the proposed deposits will be inadequate; transportation issues remain unaddressed; and new containerization issues are raised in the supplemental documents. These flaws are a direct result of the length of time this project has been on the books while Congress and the public continue to squabble about its viability, which decreases with each adjustment to what was a bad plan from the outset 20 years ago. The Yucca Mountain Project is an outdated solution which fails to provide for advances in nuclear waste handling and should be abandoned in favor of reprocessing alternatives and continued onsite reactor storage until that solution is perfected.

Repeated failure to develop alternatives to geologic repository for the disposal of nuclear waste

We shouldn't have to have landfills at all: They are an economically expedient time-bomb; they always fail; and this has been long admitted by their proponents. The effect upon climate change posed by the landfilling method of disposal for all wastes is only the most recent reason to abandon landfilling and use technology to reduce, re-use and recycle all wastes.

These supplemental documents also fail to provide alternatives to the geologic repository of nuclear waste. See Conclusion, below.

Repeated failure to designate planned routes into Nevada from neighboring states for public review and local agency planning

The project proposes to transport waste by rail, road or both from sites all over the United States to Yucca Mountain, yet fails to provide specific information about any of the proposed transportation routes outside Nevada.

The nonspecific references to eventually working things out with public officials in surrounding states won't resolve the public's profound discomfort with the project, or that of their elected representatives. I live in Southeastern San Bernardino County in Southeastern California which has one rail route on your maps through which even a casual observer can conclude that all wastes transported from the West Coast and the Southern United States will pass through our deserts to Yucca Mountain. Presumably the remainder of the large number of nuclear waste shipments from these areas would be by road on our already challenged and difficult-to-monitor surface transportation infrastructure in the poorest and least populated region of San Bernardino County. This is an environmental injustice for low-income communities placing an unfair burden of potential safety failures on our area as well as burdening our public safety officials with budgeting an unfunded

mandate for a DOE project. Many of us, including government entities, raised this issue in 2001 and it still hasn't been addressed.]

#### Financial considerations

- 3 [Taxpayers have significant financial liability whether Yucca Mountain becomes operational or spent fuel continues to be stored at nuclear plants across the country. What taxpayers have not had is a national referendum on the propriety of a geologic repository in Nevada as the solution to the nation's need for safe nuclear waste disposal, and that would be appropriate.]

#### Outstanding questions not answered in these supplemental documents

- 4 1. [South Carolina will ship its stored waste to Yucca Mountain - what about Washington state?]
- 5 2. [How many more years of safe above-ground storage is anticipated for each and every one of the nation's current nuclear generator sites? How long do we have to find a better solution than cataboxing nuclear waste?]
- 6 3. (See F below) [The supplemental documents contain references to plans to store low-level radioactive wastes resulting from the repackaging of nuclear waste at Yucca Mountain off-site. How is this possible given that the national low-level radioactive waste sites in South Carolina and Utah are reaching capacity while no new acceptable low-level radioactive storage sites have been approved, prepared or funded?]
4. See Global Nuclear Energy Partnership section below.

#### Unacceptable DOE propaganda in the published record

- 7 A. [Geologic repository of waste will not have any effect on America's energy independence- this is pure propaganda promulgated by the Department of Energy. The nuclear waste is there no matter what. The need for energy sources to supplement fossil fuel from foreign countries exists no matter what.]
- 8 B. [Yucca mountain is not a "vital federal asset." It is a nuclear waste disposal option, albeit the only one in which DOE has invested.]
- 9 C. [The scientific world, if it ever did, no longer argues that geologic repository is the "only acceptable, scientifically credible, long term solution for managing high-level radioactive waste." Please examine what our European progenitors and sometime allies, the French, are doing. We would do well to imitate them.]
- 10 D. [DOE cannot possibly evaluate whether transportation will be safe and secure unless and until it first designates transportation routes to Yucca Mountain, Nevada then assesses state and local governments' ability across the country to deal with nuclear waste emergencies predictable in the post-2001 world. It's a false claim about an unknown proposition.]
- E. DOE's reference to providing technical and financial assistance to surrounding states remains an unfunded mandate for unspecified transportation routes, hence unacceptable.]
- 11 F. (See 3 above) [The supplemental documents contain references to plans to store low-level radioactive wastes resulting from the repackaging nuclear waste at Yucca Mountain off-site. How is this possible given that low-level radioactive waste sites in both South Carolina and Utah are reaching capacity while no new acceptable low-level radioactive storage sites have been funded?]
- 12 G. [With the growth of Las Vegas in particular and the Southwest generally, Yucca Mountain is no longer remote. It was never remote for the Western Shoshone and these supplemental documents fail to address the environmental injustice and cultural insult to these citizens. Favoring the Caliente rail route in Nevada over the disputed Mina route while leaving the Mina route in the supplemental documentation doesn't address or resolve the environmental injustice.]

#### Reiteration of objecting comments filed with DOE in 2000 and 2001

- 13 A. [The nation needs new classifications for radioactive wastes. Spent canisters used for transportation of high-level radioactive waste should not be classified or stored as low-level radioactive waste. Southern California Edison's radioactive wastes should be not be classified as "low level." Definitions of low-level radioactive waste need to be rewritten to exclude many "below class C" items such as these. Many of us who commented in 2001 raised this issue, and it still has not been addressed.]

14 B. [Inadequate monitoring is proposed for the Yucca Mountain Project

Reactor and storage sites should be monitored forever. There is no other safe and reasonable alternative. Both the preferred alternative of constructing the Yucca Mountain geologic repository then sealing it with passive institutional barriers in place and the no-action alternative providing for only 100, or even 500, years of monitoring nuclear waste stored at current nuclear reactor sites are illogical given the known half-life of the stored materials. The supplemental documents are insufficient because they do not address inadequate monitoring of current sites or the the preferred alternative site after its closure. Many of us who commented in 2001 raised this issue, and it still has not been addressed.]

Transportation issues

15 [When our country's transportation of nuclear waste has failed, it has been spectacular. I mention only the 2007 unapproved transshipment of active nuclear material across country on an airplane. Please refer to my Exhibit A which will be provided to you via the U.S. Postal Service with a copy of this document. The truck you will see in that photograph is what we anticipate might be moving through Southeastern San Bernardino County in Southeastern California, which has only one rail line accessing Yucca Mountain, Nevada from the entire West Coast and Southern United States. (EXHIBIT A ) Do you want this in your neighborhood? (Remember that there has been no economic development at Chernobyl.)]

16 [Varied containerization is not appropriate

The supplemental documents raise new questions about plans to repackage waste on site at Yucca Mountain. There is no reason why nuclear waste should have to be repackaged to be catboxed in a geologic repository, or is the only reason the expense to the generator? It adds insult to injury that DOE proposes that its own waste (and possibly the waste of foreign countries) containerization does not have to meet the standard required by commercial reactors. Reprocessing is the only excuse for repackaging nuclear waste. All producers of nuclear waste should be required to use the same, most advanced, technology before any nuclear wastes are transported from any one place to another.]

17 [Financing is not supported

Where have the \$1.8 billion annual mandatory payments into the Nuclear Waste Fund GONE? No wonder Congress has, quite reasonably, reduced annual appropriations and hesitates to expand this industry. The tragedy is that with foreign fossil fuel sources increasingly insecure and options for domestic fossil fuel extraction increasingly unacceptable to an environmentally protective public, the nation needs now, more than it did at the beginning of this century, public confidence which might drive nuclear research leading to expansion of this potential source of clean, renewable energy. Many of us have a problem with the limited, expedient method proposed by DOE for disposal of nuclear waste, but not the benefits of the technology itself. The nuclear cat is out of the box: let's learn to use it wisely and safely for the benefit of humankind.]

Global Nuclear Energy Partnership

18 [Most North Americans are going "What the hell is this?" while reading about it only in the foreign press. The Bush Administration apparently has agreed to import waste from nineteen foreign countries for "reprocessing" then storage - where? at Yucca Mountain presumably - and DOE is working on the "Programmatic Environmental Impact Statement for the Global Nuclear Nuclear Partnership?" This raises the question of storage capacity at Yucca Mountain as well as the question why can we not reprocess all nuclear waste instead of putting any of it in a geologic repository if we are marketing that ability to our select nuclear allies?

Over the 20-plus years of planning, Yucca Mountain's adequate storage capacity for (1) all wastes currently stored within the continental United States at nuclear reactor sites, and (2) projected nuclear waste storage capacity for the 50 years the geologic repository at Yucca Mountain is scheduled to be operational (even if the United States does not build new nuclear reactors to replace increasingly insecure foreign or environmentally unacceptable domestic fossil fuel sources) has lagged. It just isn't going to be possible to ALSO store nuclear waste coming in from 19 foreign nuclear allies at Yucca Mountain. And in what type of containers will these wastes arrive? will they be made in China, which

has not been able to ensure either the safe import of animal food or children's toys to our country? And on what routes will these foreign wastes be shipped to the storage site? Imported on the West Coast then sent through our San Bernardino County deserts to Nevada? (See above.)

Conclusion

19 [Congress erred in 1987 in directing that Yucca Mountain be evaluated as the only site for a national geologic repository for nuclear waste and erred in not directing DOE to research alternatives to geologic repository of nuclear waste at that same time. Don't compound the error!

Most of the nuclear reactors are east of the Mississippi River and those living in the eastern half of the United States benefit most from nuclear power. Sacrificing one state, region or landscape for the convenience of those who do not live there is never appropriate public policy, and I'm told never leads to solutions so long as people do not have to live with the consequences of their lifestyles. We all know that the open land remains in the West. It remains here because we who have lived here for generations have sacrificed to protect it for everyone else. The American West is one of the last places on the planet containing what is become the most precious resource - unspoiled open space. Realize it. Protect it.

Use technology to find solutions for nuclear waste recycling.]

Thank you once again for legible documents to review and thank you for the opportunity to comment.

Very truly yours,  
Signed  
Iona Chelette  
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Joshua Tree, CA 92252-2622  
[REDACTED]

Duplicate to follow via USPS with Exhibit A photo.

**Name List**

Iona Chelette



U.S. Department of Energy  
Executive Secretariat - Correspondence Control  
Folder Profile  
EXEC-2008-000632

**Title:** E-mail to Secretary Samuel Bodman from Iona Chelette

**Subject:** Iona Chelette expresses opposition to proposed repository for nuclear waste at Yucca Mountain.

**Control Number:** EXEC-2008-000632

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<b>Addressee Office:</b>	Samuel W. Bodman	<b>Due Date:</b>	
<b>Action Requested:</b>	Program Determination	<b>Completed Date:</b>	16-Jan-2008 12:00AM
<b>Priority:</b>	Routine	<b>Status:</b>	completed
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