

EIS Office, US Dept. of Energy
Office of Civilian Radioactive Waste Mgmt
1551 Hillshire Drive, Las Vegas NV 89134

Official Comments Regarding the 10/07 Draft Supplemental Environmental Impact Statement for Yucca Mountain

Pertaining to the Draft Repository SEIS:
Site Characteristics

- 1 [The SEIS states that the site is isolated from concentrations of human population and activity. However, Pahrump and Las Vegas Nevada are among the fastest growing populations in the U.S. Downstream from the site, groundwater 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.]
- 2 [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. Flash floods are frequent, and can close roads for days. Though the groundwater beneath Yucca Mountain may flow into a "closed" hydrogeologic basin, this basin covers thousands of square miles, and many communities depend on this groundwater for survival. Research conducted by Inyo County, CA, defines fast pathways from Yucca Mt. to area springs used for drinking water by many.]
- 3 [The SEIS reports that the site is on land controlled by the Federal Government, but it is located on lands belong to the Western Shoshone nation by treaty, and the U.S. Government cannot provide proof of title, even when requested by international courts.]

A [Regarding the Transportation, Aging and Disposal (TAD) Canisters

The draft SEIS contains no final TAD designs, so the impacts of the TADs on the repository and transportation systems cannot be assessed. As there is no rail access at Yucca Mountain, and no guarantee that there will be in the future, the SEIS should have assessed the impacts of a transportation system that use another primary mode of transportation to Yucca. TAD containers are not compatible with systems already in place in many reactor sites, and the SEIS needs to contain a comprehensive assessment of the risks and impacts to workers, facilities, and communities where handling or repackaging operations would take place. Many utilities have specific problems with use of the proposed TAD system at specific reactor sites, and DOE offers no meaningful alternative to the TAD system.]

Regarding the Draft Rail Alignment SEIS:

- 5 [The draft Rail EIS includes the Mina Rail Corridor as a "non-preferred alternative." However, this is not a viable alternative, as required by NEPA, given that the Walker River Paiute Tribe has refused permission for the DOE to use any portion of its reservation for the proposed rail spur.]
- 6 [The repository SEIS should have evaluated the impacts of a legal-weight truck transport system nationwide and within Nevada.]
- 7 [The DSEIS does not adequately address transportation and safety issues, such as worst case accidents - such combinations of factors that are "not reasonably foreseeable".]
- 8 [It underestimates the consequences of severe accidents involving long duration fires, terrorist attack, and the potential for human error.]
- 9 [Because the DOE has announced that the rail line it proposes would be a "Shared Use" line, the USDOT Surface Transportation Board should be the lead agency that prepares the Rail Alignment EIS.]
- 10 [The DOE contention that the non-rail shipments would be made by over-weight trucks is unsubstantiated, as the impact of the used of over-weight trucks in Nevada and elsewhere are not analyzed.]

Please keep me updated on all developments requiring public input.

Sincerely,

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