



Tony Guzman <tg5110@hotmail.com> on 01/09/2008 08:40:43 AM

To: <eis_office@ymp.gov>
cc:
Subject: Yucca comments

RRR000932

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

The following are my comments for the Supplemental Yucca Mountain Repository, Nevada Rail Corridor and Draft Rail Alignment Environmental Impact Statements. Thank you.
Tony Guzman

- 1 [1. DOE should extend the public comment period by 60 additional days, given the enormity of the project and the need to maximize public involvement as much as possible.]
- 2 [2. DOE must integrate into its Yucca Mountain transport analysis its own proposals, under the Bush administration's "Global Nuclear Energy Partnership" (GNEP), for waste imports from overseas, and waste shipments to reprocessing (plutonium extraction) centers in the U.S. before waste shipments to Yucca for final disposal. DOE must also analyze the increased transport risks from its proposal to nearly double the amount of waste to be buried at Yucca to 130,000 metric tons – which on its face violates the Nuclear Waste Policy Act, as amended, which limits the amount of waste that could be buried at the first repository to 70,000 metric tons, at least until a second repository is opened in another state.]
- 3 [3. DOE proposed the equivalent of the TAD (Transport, Aging, and Disposal) canisters in the early to mid-1990s, only back then it was called MPC (multi-purpose canisters). DOE needs to completely explain why it is attempting to revive an idea it had dismissed as unworkable over a decade ago. DOE needs to fully explain the increased risks to workers and the public at and near the nuclear reactors across the U.S. where TADs would be loaded and permanently sealed forevermore. Those risks have now been shifted largely to the reactor sites, away from Yucca where they were previously proposed to take place. How will waste handling errors at reactors, especially involving defective TADs and damaged irradiated nuclear fuel, worsen transport risks, as well as radioactivity releases at Yucca over time?]
- A [4. DOE must remove any discussion of "aging pads" at Yucca Mountain because it seems to contradict the Nuclear Waste Policy Act. DOE's proposal would be dangerous and because it could place all of the burdens (both interim storage and permanent disposal) on one state.]
- 5 [5. A federal judge, ruling against DOE and in favor of the State of Nevada over DOE's illegal use of water at the Yucca Mountain Project, recently concluded that DOE either is engaging in "busy work" at the site (wasting not only water, but also Nuclear Waste Fund monies), or else it misled Congress and the President in 2002 that site characterization had concluded at the site when DOE announced the site suitable for a high-level radioactive waste dump. The Nuclear Waste Policy Act, as amended, required DOE to apply for its license application on Oct. 23, 2002, assuming that DOE's site suitability determination would mean that DOE must be extremely close to ready to submit a complete license application. Yet, incredibly, over five years later, DOE has still not submitted its license application. DOE has known for over a decade that rainwater percolates relatively quickly through the proposed burial site, and risks fast corrosion of the waste containers that would be buried there. In fact, DOE scandalously did away with its own Site Suitability Guidelines that would have disqualified the site for this reason from any further consideration, just before declaring the site suitable. DOE should admit to Congress and the President that the site is in fact not suitable, and begin to conduct a sound scientific search for suitable geology that can isolate radioactive waste from the living environment for a million years. DOE must stop its attempt to rush the submission of its still half-baked licensing application by its arbitrary, capricious, self-imposed June 30, 2008 deadline. This is an obvious attempt to initiate the Yucca licensing proceeding before the pro-Yucca dump Bush administration leaves office, to make Yucca a "done deal" before the next (and possibly anti-Yucca dump) President enters the White House.]
- 6 [6. Nearly 1,000 environmental, public interest, consumer, and taxpayer organizations, as well as many

cities, counties and even states -- representing many millions of Americans -- have expressed opposition to various aspects of the Yucca Mountain dump proposal over the past twenty years. DOE should declare the Yucca Mountain site unsuitable, terminate the project, return the land to its prior condition, and seek guidance from Congress and the President on next steps for addressing the nuclear waste dilemma, as provided for in the Nuclear Waste Policy Act, as amended. DOE should heed the call by 150+ groups across the U.S., that high-level radioactive wastes stored on-site at reactors be safeguarded and secured against accidents, attacks, and leakage until a scientifically sound and socially acceptable long term waste management plan is arrived at through democratic and just means. The one to two million dollars per day being wasted at the dead end Yucca Mountain Project should be immediately re-directed to securing and safeguarding on-site waste storage at reactors, that will inevitably remain in place for decades to come. Because of the reasons above and many others, I urge the DOE to move towards the "no action alternative" that would stop work at Yucca Mountain and start a truly sound process at finding a national repository.]

Put your friends on the big screen with Windows Vista® + Windows Live™. [Start now!](#)