

# Alliance for Nuclear Accountability

*A national network of organizations working to address issues of  
nuclear weapons production and waste cleanup*

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## Member Groups

Blue Ridge Environ. Defense League  
Glendale Springs, NC

Carolina Peace Resource Center  
Columbia, SC

Citizen Alert  
Las Vegas, NV

Coalition for Health Concern  
Benton, KY

Colorado Coalition for a Nuclear  
Weapons Free World  
Denver, CO

Concerned Citizens for Nuclear Safety  
Santa Fe, NM

Fernald Residents for Environmental  
Safety and Health, Inc.  
Ross, OH

Global Resource Action Center for  
the Environment  
New York, NY

Government Accountability Project  
Seattle, WA

Healing Ourselves and Mother Earth  
Tecopa, CA

Healthy Environment Alliance of Utah  
Salt Lake City, UT

Heart of America Northwest  
Seattle, WA

Miamisburg Envir. Safety & Health  
Miamisburg, OH

National Environmental Coalition  
of Native Americans  
Prague, OK

Nuclear Age Peace Foundation  
Santa Barbara, CA

Nuclear Watch of New Mexico  
Santa Fe, NM

Nuclear Watch South  
Atlanta, GA

Oak Ridge Envir. Peace Alliance  
Oak Ridge, TN

Panhandle Area Neighbors  
and Landowners  
Panhandle, TX

Peace Action Education Fund  
Washington, DC

Peace Farm  
Panhandle, TX

Physicians for Social Responsibility  
Washington, DC

Portsmouth/Piketon Residents for  
Environmental Safety & Security  
McDermott, OH

Rocky Mt. Peace & Justice Center  
Boulder, CO

Shundahai Network  
Salt Lake City, UT

Snake River Alliance  
Boise, ID

Southwest Research and  
Information Center  
Albuquerque, NM

Tri-Valley CAREs  
Livermore, CA

Women's Action for New  
Directions  
Arlington, MA

October 30, 2006

Dr. Jane Summerson, EIS Document Manager  
Regulatory Authority Office  
Office of Civilian Radioactive Waste Management  
US Department of Energy  
1551 Hillshire Drive, M/S 010  
Las Vegas, NV 89134

Dear Dr. Summerson:

The Alliance for Nuclear Accountability (ANA) submits the following comments to the U.S. Department of Energy (DOE) regarding its Notice of Intent (NOI) to Prepare a Supplemental to the Final Environmental Impact Statement (EIS) for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada. On behalf of the 35 member organizations within the Alliance for Nuclear Accountability national network, we hereby request that DOE consider our comments and place them into the official record.

The recent Notice of Intent published in the Federal Register announced plans for a study of the impacts of a redesigned nuclear waste handling complex at the proposed Yucca Mountain repository. This move signifies DOE's new direction for the nuclear waste project in response to confronting high costs and technical challenges to its work on the repository.

This new canistered approach calls for most (90%) of the commercial spent nuclear fuel to be packaged at the commercial sites in "Transportation, Aging and Disposal" (TAD) canisters and all DOE materials to be packaged in disposable canisters at the DOE sites and placed in waste packages for disposal. However, a similar concept using a MultiPurpose canister (MPC) was proposed and terminated in 1995 as impractical and too costly. In addition, according to the Nuclear Waste Technical Review Board in a letter dated June 14, 2006, DOE faces hurdles in making the TAD canisters available in time for licensing and use by utilities. The Board also went on to say DOE was unable to provide enough details at a May 9 presentation about how the waste would be handled once it arrived at the Nevada site.

## **Waste Isolation**

With the confusion over cask design, and continued discussion over reprocessing, there is no standardization over containment for disposal purposes and no planning for repackaging facilities.

## **Interim Storage**

This new approach using the TAD canisters calls for concrete "aging pads" where nuclear waste would be stored prior to placement in the repository. Essentially, these aging pads constitute an interim storage facility at Yucca Mountain which is currently illegal in Nevada under the Nuclear Waste Policy Act.



### **Worker Safety and Health**

There has been inadequate training of rail workers and emergency response workers. In the most recent Homeland Security funding bill, funding for rail safety and training of emergency response workers for hazardous materials was actually cut. Tighter oversight of shipments would ensure that workers are informed of any problems that arise. In addition, the attempt by DOE to move spent fuel management to the TAD approach actually increases the environmental and work hazards at the reactor sites. DOE plans to shift responsibility of loading canisters, drying, and welding them shut to the reactor sites. This would be at a considerably greater risk, effort, and expense to the sites.

### **Transportation**

There is no nation-wide transportation plan for moving high level radioactive waste and spent nuclear fuel to Yucca Mountain. Planning is being left to regional planning organizations under the US Department of Energy's Transportation External Coordination Group, with the MidWest Routing Policy being used as the basis of the transportation routing plan<sup>1</sup>. In addition, there have not been adequate scoping meetings across the U.S. in 43 states where this radioactive waste will traverse on roads and rails putting these communities at risk for radiation exposure.

### **Water and Air Resources**

Research done by the State of Nevada indicates more rapid corrosion of the proposed drip shields. This corrosion could lead to leaking into the aquifer that lies beneath Yucca Mountain. Because we cannot say with any certainty what the climate will be of the Great Basin Bioregion in 10,000 years, a drastic change in rainfall, could radically alter the models of anticipated water seepage into the storage caverns<sup>2</sup>.

### **Cumulative Impacts**

This project has the potential for catastrophic environmental impact starting with the potential for radiological release through accident, sabotage or terrorism while the waste is en-route, in leakage from the storage systems through unanticipated climate change, geological event, or inadequacy of information passed on to succeeding generations about the toxicity of the contents of the site

The Department of Energy's Yucca Mountain project has been besieged by countless problems that have ultimately delayed the submission of a license application to the Nuclear Regulatory Commission. These problems include Yucca Mountain's inability to meet public health, environmental, geologic, and safety standards; inability to meet hazardous waste regulations through the Resource Conservation and Recovery Act; waste containers which are prone to corrosion; an inadequate waste transportation program; conflicts regarding land use; and a myriad of other reasons that make Yucca Mountain unsuitable for a permanent geological repository for the nation's spent nuclear fuel and high level radioactive waste. DOE's solution is to ignore the problems with Yucca Mountain and override states' authority over land use, water rights, and even hazardous waste management requirements through passage of legislation which was introduced earlier this year.

Thank you for your consideration of the Alliance for Nuclear Accountability's comments on the Notice of Intent for a Supplemental to the Final Yucca Mountain Environmental Impact Statement.

Sincerely,



Susan Gordon  
Executive Director

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<sup>1</sup> U.S Department of Energy Transportation External Coordination (TEC) Working Group Meeting, March 14-15, 2006, <http://www.tecworkinggroup.org/rail/Rail%20TG.pdf>

<sup>2</sup> Status of the Yucca Mountain Nuclear Waste Repository by Victor Gilinsky, Nevada consultant, Science, Technology, and Security Seminar, Stanford, March 7, 2006: <http://www.state.nv.us/nucwaste/news2006/pdf/stanford060307gilinsky.pdf>