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IP address: 69.239.138.239

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The Commentors Name:  
---> John Hadder

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The Commentors Address:  
--->POB 6595  
--->reno, Nevada 89513

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Email Information:  
--->hadder@gbis.com  
---> Add commentor to the mailing list : yes

~~~~~  
Contact Information:  
---> fax number :  
---> phone number : 7753481986  
---> organization : HOME  
---> position : Reno Programs Director

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Comment Text :  
-->December 12, 2006

Jane R. Summerson, EIS Document Manager  
Yucca Mt Office, U.S. Dept of Energy  
1551 Hillshire Drive, M/S 010  
Las Vegas NV 89134

Addendum Comments from HOME on Proposed Scope of Supplement and Amendment to the Final EIS for Yucca Mountain HLW Repository (NOIs 10/13/06)

Public Process

The Reno Scoping Meeting as all the other meetings was inadequate in addressing the spirit of the National Environmental Policy Act. In order to maximally inform and solicit comments from the community on the new proposals for the Yucca Mountain Project the Dept. of Energy (DOE) should conduct a hearing process as well as the "poster session." There is an important information sharing element that was missing from the scoping meetings; collective sharing. The public should hear the questions of other members of the public as well as the DOE's response to these questions. People are also better informed when they hear all of the comments from their fellow citizens. Indeed, there is a synergistic effect of hearing and processing other people's question and comments, which is like triggering mechanism whereby one person's comment or question accesses a memory or idea in another person.

HOME would like to see informational booths with staff available for a broad period of time, and then a collective hearing style process. The start time for the collective process should be clearly advertised, so that the public knows when to come for the hearing and when only the poster session is happening. We recommend this be done for the draft supplemental EIS next year.

HOME was also disturbed by the limited number of scoping meetings that occurred. The Yucca Mountain Project is of national scope, and we expect hearings (meetings) to be held in all the locations where the initial EIS hearings were held. Given that the proposals will impact the transportation of the waste most of the county will in some way be directly impacted, and so should be involved specifically. We expect the hearings for the draft document will be held at least all the locations where the EIS was held.

#### Proposal Specifics

We will not repeat the technical comments forwarded from the State of Nevada, which HOME supports. In general, the TAD concept appears to be a better handling and potentially safer method of transportation and disposal, but we will reserve final judgment until the draft document is released with more details. The information in the federal register and at the meetings was only sufficient to garner a general idea of the proposal, so more information should have been provided to allow for more detailed scoping comments from the public.

The Mina Alignment clearly involves a major shift in the transportation through Nevada, and potentially nationally as well. Representatives at the Reno meeting were unable to estimate the percent of the waste that would travel through Reno. HOME finds it surprising that there are no figures on this from the DOE, especially when the State of Nevada did have an estimate. HOME expects specific routing options to be studied with full disclosure of all possibilities. In the past, HOME board member John Hadder was told by DOE staff that nuclear waste would never go through Reno. Certainly a flip comment, which we hope the DOE does not repeat. The DOE needs to be fully forthcoming regarding the transportation, including detailed maps which show the various routing and volume options in advance of the draft supplement

hearing.

The DOE needs to evaluate the routes over the Sierra Nevada. In 1999, highly radioactive waste from overseas was transported by way of the Feather River Canyon route. Is this to be the preferred route or along the I-80 corridor? Is one route a back up for the other? The DOE needs to study the accident histories in each extensively. If done, we expect that the DOE will find that the Feather River Route to be quite treacherous in places. HOME expects to see a detailed analysis of how the DOE would respond to accidents over either of these routes with special attention to the Feather River route, which involves somewhat remote locations with deep and sharp canyons. It is our understanding that there still exists rail cars in the Feather River canyon from derailments years ago. The DOE needs to fully analyze how weather conditions in the Sierra Nevada's especially during winter will impact waste transportation.

Both the routes over the Sierra Nevada range involve transport near major water systems. The DOE needs to prepare a details plan for how it will handle accidents or sabotage what may occur near these water systems. In 1999, it was revealed that the "slap-down" kind of impact to a waste container is not well modeled. Just such an impact is likely if there is a derailment where the rail car and cask fall into a canyon. Again, there are sections along the Feather River where the rail is far above the bottom of the canyon, which has irregular and jagged volcanic rock outcroppings. Thus, HOME expects the DOE to improve on the cask testing analysis that has been done to date to cover the specific hazards associated with the Sierra Nevada crossing.

The DOE should also provide a proposed schedule for training of local emergency responders along the I-80, and other corridors connected to the Mina Alignment. HOME also expects the DOE to provide (at least at the hearing) the radiological training manual and process that will be used, so the public has a complete picture of how training and emergency preparation is to be accomplished. Again, HOME's experience in the past with emergency responder training has lead us to believe that the DOE has not taken this aspect of the Yucca Mountain Project seriously. This would be a good opportunity to change that perception in the public.

Thank you for your consideration of these comments,

John Hadder

Reno Programs Director

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