MS. DART: My name's Jodi Dart. I'm with the Alliance for Nuclear Accountability. My address is 322 4th Street Northeast, Washington, D.C 20002.

My comments are as follows.

The Alliance for Nuclear Accountability submits the following comments to the U.S. Department of Energy regarding its Notice of Intent for supplemental to the final Environmental Impact Statement for a geological repository for the disposal of spent nuclear fuel and high-level radioactive waste at Yucca Mountain. On behalf of the 35 member organizations within the Alliance for Nuclear Accountability national network, we hereby request the DOE to consider our comments and place them into the official record.

DOE's proposal is a major change from the Yucca Mountain EIS effecting waste packaging at reactors, waste transport, and design at the Yucca Mountain site. Yet the description of the proposed action in the Federal Register notice lacks sufficient detail to enable the public to adequately assess the full scope of the proposed changes.

In particular the Federal Register notice should include more detail on the design of the canisters and on the proposed design of the surface authority at Yucca Mountain.

The Notice of Intent published in the Federal Register announced plans for a study of impacts of the redesigned nuclear waste handling complex at the purposed Yucca Mountain repository. This may signify DOE's new direction for the nuclear waste project in response to confronting high cost and technical challenges to its work on the repository. This new canister approach calls for 90 percent of the commercial spent nuclear fuel to be packaged at the commercial sites in TAD canisters. And all DOE materials will

be packaged in disposal canisters at the DOE sites and placed in waste packages for disposal. However, a similar concept using a multipurpose canister 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 used by utilities. The Board also went on to say DOE was unable to provide enough details at a May 9th presentation about how the waste would be handled once it arrived at the Nevada site.

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

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 the 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, train, and welding them shut to the reactor sites. This would be at a considerably greater risk effort and expense to the sites.

There is no nationwide transportation plan for moving high-level radioactive waste and spent nuclear fuel to Yucca Mountain. Planning is being left to the original planning organizations under DOE's transportation external coordination group with the Midwest routing policy being used as the basis of the transportation routing plan.

In addition, there have not been adequate scoping meetings across the U.S. in the 43 states where this radioactive waste, which traverse road and rails, putting these communities at risk for radiation exposure.

Research done by the State of Nevada indicates more rapid corrosion at 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 at the Great basin region in 10,000 years, the drastic change in rainfall could radically alter the models of anticipated water seepage into the storage caverns.

This project has a potential for catastrophic environmental impact starting with the potential for radiological release through accident, sabotage or terrorism while the waste is en route. And the 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.

DOE's Yucca Mountain project has been seized by countless problems that have ultimately delayed the submission of a license application to the NRC. These problems include: Yucca Mountain's inability to meet public health, environmental and geologic, and safety standards; inability to meet hazardous waste regulations through RCRA; waste containers which are prone to corrosion; an inadequate waste transportation program; conflicts regarding land use and a multitude of other reasons to make Yucca

Mountain unsuitable for a permanent geological repository for the nation's spent nuclear fuel and high-level radioactive waste.

DOE's solution has been to ignore the problems of Yucca Mountain and overwrite the state's 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 consideration of Alliance for Nuclear Accountability's comments and on the Notice of Intent for a supplemental into the final Yucca Mountain Environmental Impact Statement.

Sincerely, Susan Gordon.