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1 SEP 27 1999 MR. BUQO: Good evening. My name is Tom Buqo.
2 I live in Blue Diamond, Nevada, and since 1976, I've been a
3 consultant to the Nuclear Waste Project Office on water
4 resource issues.

5 Is that better, Ralph?

6 MR. McCRACKEN: Yes.

7 MR. BUQO: This morning, for those folks that
8 weren't here, I talked about the cumulative impacts of the
9 proposed action on water resources and the inadequacy of the
10 EIS with respect to those issues.

11 Rather than go over that again, tonight I'd like
12 to touch on two other topics, mitigation and uncertainty.

13 Okay. If you look at the EIS, the only
14 mitigating measure being considered by DOE with respect to
15 water resources is they're going to put a -- consider put ago
16 drip shield over the waste.

17 Well, a drip shield does not mitigate the impacts
18 of lost water resources because of federal land. It does not
19 mitigate the impacts of the loss of prime well sites along
20 forty mile wash.

21 All it does is mitigate a little bit the impacts
22 of contamination, so I want to talk about mitigation.

1 23 First and foremost, Nye County is a proponent of
24 alternative repository design, including natural ventilation.
25 We believe that that will lead to a safer repository, and a

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1 continued 1 safer repository is Nye County's number one concern.

2 Secondly, active groundwater controls. We don't

2 3 see any concept being put forth by DOE to go in and improve the
4 suitability of the site.

5 We routinely go in and deep water mines to the
6 State of Nevada because of the water below the ore piles. No
7 one's talking about going in and decreasing the water level
8 underneath Yucca Mountain. We see that as a viable mitigating
9 measure that increases the distance between the waste and the
10 water resources.

11 Third is the area of wellhead protection. I
12 travel all over Nye County. I know what the towns are like,
13 and the transportation, everything says it's going to be okay.
14 There's not going to be any problems.

3... 15 Mistakes happen, accidents happen. Nye County
16 must, as a mitigated measure, be given the wherewithal to
17 implement and comprehend a wellhead protection programs in the
18 communities of Beatty, Amargosa Valley and Pahrump where these
19 wastes are going to be traveling through.

20 These same mitigation measures would carry over
21 to out neighboring counties like Goldfield along the route and
22 White Pine County and Lincoln County, as well.

23 Part of wellhead protection is providing an
24 emergency response capability if there is an accident. No
25 matter how much you plan, no matter how well prepared you are,

3 cont. 1 things still happen.

2 Nye County must be in the position to be prepared
3 for it when it happens, not react to it after it happens.

4 Fourth item is water supply replacement. Another
4 5 mitigation measure no one is bringing up. That's a simple
6 solution.

7 If there is a risk to a receptor population, you
8 do the same thing that they do at failed hazardous waste sites
9 throughout the United States. You come in with an alternative
10 water supply.

5 11 The next item is continued oversight. We're
12 talking about long time frames here. 300 years at closure.
13 10,000 year performance period.

14 We have no idea what the world is going to be
15 like, what the United States is going to be like or what this
16 region's going to be like, but we do know one thing: If the
17 project goes forward, the waste will still be there; the threat
18 of contamination will still be there.

19 Therefore, Nye County has to be assured through
20 mitigation that there will be continuous oversight of these
21 wastes as long as they pose a threat, and as a matter of just
22 common sense, that capability has to be provided here in Nye
23 County; it can't be done back in Washington, D.C.; it can't be
24 done in Las Vegas. It has to be done here.

6... 25 Another item is maintenance of capability. Same

6 continued 1 thing. Who's going to ensure that the information that we know
2 about the repository today is going to be available a hundred
3 years down the road or 300 years down the road?

4 When a problem occurs, there's going to be a mad
5 scramble to say, "What do we do? What's it like?"

6 We have to maintain that capability and knowledge
7 about that repository with waste in it and what to do in the
8 event of a failure.

9 Now moving along to uncertainty, as you look at
10 the EIS, they present a lot of risk numbers in there. The risk
11 is this, the risk is that.

7 12 Those risks are based upon models instead of
13 measurements. The data is only now being selected to go in and
14 put into the models so that they can come up with a meaningful
15 result, and when we go back, there was a peer review process
16 that looked at the Department of Energy's models and came back
17 with a very scathing comments, in fact, talking about a deluge
18 of models in a drought of data and pseudo-sophisticated models
19 and that sort of thing.

20 So these models are being used to come up and say
21 here's what the risk is. I don't put much faith in those
22 models, and I think that uncertainty should be much more
23 clearly stated in the EIS.

8... 24 And finally, you're looking at radioactivity and
25 the risks associated with radio -- with exposure to

EIS000080

8 cont. 1 radioactivity. There's a little thing out there called
2 toxicity and you only look at the toxicity of the non-
3 radioactive constituents.

4 The radioactive constituents also have a toxicity
5 and a risk associated with that toxicity, so if you want to
6 look at the total risk to Amargosa Valley over the coming
7 decades, you've got one, the risk of the naturally occurring
8 uranium in the water up north of 95; two, the risk of the
9 migration of tritium and other contamination off of the Nevada
10 Test Site; three, the toxicity of the materials on the Test
11 Site; four, any contributions from radionuclides coming from
12 Yucca Mountain; and five, the toxicity of those.

13 The EIS does not cover all of those. It only
14 looks at the radioactivity from Yucca Mountain and it needs to
15 be revised to incorporate the entire suite of what is out
16 there.]

17 Thank you.

18 MR. BROWN: Thank you.