

To: Wendy R. Dixon, DOE
Comment on EIS Y.M.
December 7, 1999

From: Sally Devlin
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SHIFT IN GOVERNEMENT POLICIES COULD SAVE THE NATION FROM PROGRAMMED EXTINCTION

1. Can NRC ask the Congress in all good conscience to change the law so that Y.M. project is allowed to kill 500 people per year out of a city the size of Las Vegas?

The current Congressional law (EPA) allows 1 person out of 1 million to die of radionuclide poisoning, (cancer) under the Safe Drinking Water Act. (4 mrems) (Acceptable if you're not the 1 person)

OCRWM, EPA, NRC, are aware the "Contaminates (like high level radionuclides) in ground water, unlike those in other media, such as air or surface water, can with relative little mixing or dispersion so concentrates can be relatively high." (p 47001/ F.R./ Vol 64/ No 162/ 8/27/99) No mention of colloids or their movement in EIS.

2. If all the Government agencies policies of keeping the number and types of cancers that were caused by their programs were unconcealed, wouldn't the public appreciate your efforts towards better projects when you'd go from secrecy to results management?

Why is the blanket term "assumed uncertainty" (quote Lake Barrett, DOE) and used by all Government agencies when a problem occurs and no one wants to handle it? Realistic and well grounded programs are what the public expects and pays for and if we got the former then this might usher in a new era of confidence in our Government agencies.

3. 2. NAS professors don't have the needed industrial experience or business experience and are not expected to understand that Industrial Turnaround Experience is needed for this world class project. NAS doesn't want to assume the responsibility that modern science and common sense would make all contingent Y.M. plans unacceptable. They clearly express that they don't want the public involved in this process at all.

a. for example....Contingency plans: The removal of the rods from the ponds without incident is almost impossible at many sites. Hanford is such a site. The M & O Fleur-Daniels even with \$1 billion over their last years budget does not have the expertise to do the job. The cost at this one site is \$1.7 billion. Can this M & O be allowed to continue to wag the tail of the DOE & DOD & NRC? I will continue to contend that CLASSIFIED waste cannot be allowed in Y.M.

- 4... b. Transportation: The only intra-state north south highway is US 95 in all of Nevada. On the proposed routes there is not one road in the entire state of Nevada capable of withstanding the weight of one 120 ton truck much less 300 of them. Most of the roads, bridges

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4 cont. etc. nationwide need substantial upgrading and much new infrastructure that would withstand the weights as well as the huge numbers of deliveries to YM in Nevada. There are no existing railroads to YM or NTS. The three studies, Carlin, Caliente or through Pahrump (2) are not viable because of the insurmountable environmental dangers as well as the inordinate costs. Heavy haul trucks going down unsound highways at 15 to 30 miles per hour would cause untold accidents. Price Anderson liability, \$560 million dollars is hardly enough to build half a casino in Las Vegas much less cover a major predicted catastrophe in any major city. DOT's accident rate is wretched. Are there any coordinated plans from the DOE, NRC, DOT and the other agencies that are not dependent on some M & O doing the homework?

Estimate for transportation project is over \$1 trillion.

5 c. Plans for the Cannisters: Is there any metal or metallic compound that can withstand temperatures of 300° - 360° C? The Nelson limits were created by observation of catastrophic failure whenever metallurgy was not appropriate to contain a variety of elements under harsh conditions. At the NRC & DOE meetings 1 out of 100 cannisters would blow. Is this the reason for the 12 mile buffer zone in the EIS?

MC I (my bugs) will enjoy eating the cannisters (as proved by the tests performed by Livermore Labs. at YM) and the bugs will add even more poison into the water in the leaky mountain. Liability for on site accidents is also unknown.

Estimate for 1 repository cannister costs \$60,000,000,000.00)

6 d. Designs for the Repository itself: There are no concrete plans for one much less two repositories. The application of real or artificial barrier systems are still in the conversational stages. Where & how would the cannisters be stored (hot, hot) temporarily until the cave is burrowed out? The International Nuclear Industry is waiting and watching carefully to see how fast we can succeed in blowing ourselves up. All of the extrapalations done by our famous DOE physicists will mean nothing because there is no DOE policy on how long the mountain would remain open or how many years it would take to fill (1 or 2). The law says you cannot close the mountain until it is filled.

Again the only answer is transmutation and recycling by our business trained trillionaires. Projected cost for 1 repository \$35 billion.

7 e. Emergency Medicine: If a predicted accident would occur where would anyone go for treatment along the proposed routes? (rail or truck?) How long would it take to train all of the necessary personnel for any medical emergency much less a nuclear catastrophe. None of this is addressed and it is a major concern. Please DOE get hopping on this.

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- 8 f. Sabotage & Terrorism: YM, NTS, Hoover Dam & so many other sensitive sites that the transporting would go through are not considered in the EIS. Are all of the involved agencies intracommunicating with the FBI, FEMA etc. on this potentially devastating occurrence? Cost????
- 9 g. Socio & Economic hardships. Under Executive Order 12866(58 FR 57735, Oct. 4, 1993) and other OMB reviewed Presidential Orders will affect the economies of many places in the nation. YM could potentially materially alter, as well as adverse economic impacts on a city like Chicago or a town like Pahrump. (\$100 million or more impact)
- 10 The health effects as well as the stress is incalculable. What \$ figure can be placed on the genetic changes, mental retardation etc. to our future generations? How many billions of dollars is spent on cancer treatments? We'd like to see estimated costs on the cancers that will occur. (numbers anticipated from YM project from all 43 state)
- 11 Conclusion: The YM project is only interpretations of models that lack sufficient supporting data. The EIS only points out the uncertainty of YM that is grossly underestimated.
- 12 Solution: Understanding the roles of all the groups involved with YM is the key to putting this new team efficiently into operation. For example: Show the trillionaires who own the nuclear power plants & other corporate investors that they can make billions of dollars. Assure this group that by transmuting and recycling etc. that they with everyone's help (open communication) will ensure our countries prosperity. How can you reorganize your day to day operations to work with a business leader like CROWE who built Hoover Dam. There are many like CROWE out in the real world who can turn you into heroes. If and when you do this under results management the Congress will augment your funding. Find a person like CROWE to lead you and then you can really be effective and accountable and restore confidence in government by your actions.

Sally Devlin
Group consensus as always

More to come under separate cover after the holidays....