RECEIVED
NOV 16 1999

25 MS. MARSH: Good afternoon. My name is

1 Amy Marsh. I'm a citizen from Glenwood Springs,
2 Colorado.
3 First of all, thank you for providing this
4 opportunity for us to speak. I'd like to say again for 1
5 the record that this is the only hearing between Salt
6 Lake City and St. Louis, Missouri. I would urge the
7 DOE to honor the request for local hearings. I
8 understand there have been several.
2 9 The draft EIS does not identify and
10 specifically analyze national transportation routes for
11 rail and highway shipments, although highway routes can
12 be identified by applying national highway routing
13 regulations to these shipments, and rail routes can be
14 identified by examining available rail lines in their
15 classification.
16 The draft EIS could have analyzed impact
17 specific to national transportation routes after first
18 identifying the routes based on available information,
19 but it did not make such an analysis. Instead, it
20 performed a limited generic transportation analysis
21 that avoided analysis of specific conditions, impacts,
22 and hazards along the routes. Quite frankly, I believe
23 this is a cursory approach towards transportation,
24 which is the issue that most affects the American
25 public.

2 (continued)

If the infrastructure does change, then I say we reanalyze it. This is a big issue; we take our time; we do it right the first time. We're not talking about transporting M and Ms here.

I believe the public deserves and must have a detailed transportation analysis provided by the DOE, including specific routes, loads, transportation types, environmental effects in specific areas, seasonal route changes before the decision, the final decision on Yucca Mountain is determined. This must be made clearer to the public, especially in light of the DOE's requested input about transportation issues from the public.

3 (cont. on P4)

The No Action alternative does not meet the need for requirement that it be a reasonable alternative to the proposed action. Neither of the two scenarios analyzed as the No Action alternative would ever be considered for implementation.

Scenario one assumes that spent nuclear fuel and high-level radioactive waste will be kept at 77 source sites under institutional control for at least 10,000 years.

Scenario two assumes the waste will remain at the 77 sites in perpetuity under institutional control for 100 years.

53

3 (continued)

1 DOE states in the draft EIS that neither
2 scenario would be likely if there were a decision not
3 to develop a repository; however, they are part of the
4 analysis to provide a baseline for comparison to the
5 proposed action. If the alternative is not reasonable,
6 then the comparison also is not reasonable or of any
7 substantive value.

4

8 Socioeconomic impact analysis in the EIS
9 is limited to standard impacts. There's no analysis of
10 potential socioeconomic upset due to repository
11 operation and transportation under both normal and
12 accident conditions.
13 The knowledge that nuclear waste
14 transportation or accidents are associated with
15 particular locations can have adverse economic impacts
16 on those locations due to stigma.
17 Las Vegas and Clark County, Nevada, with
18 the tourist based economy as well as in my state,
19 Glenwood Springs, and most of the towns and resorts
20 along the I-70 corridor are particularly vulnerable to
21 economic impacts of stigma. Other locations, both
22 urban and rural, especially under accident conditions.
23 The EIS should consider the stigma
24 associated with the proposed action, and evaluate
25 potential mitigation options.

4

5

1 Regarding environmental justice, the DOE
2 states in the draft EIS that it believes there would be
3 no disproportionately high and adverse impact to
4 minority or low income population as a result of the
5 proposed action, including national transportation.
6 The EIS includes a differing perspective
7 for Native Americans in Nevada. The draft EIS provides
8 no response to the Nevada Native American differing
9 position.

6

10 Also, with the generic nature of the
11 national transportation analysis, the EIS' findings
12 regarding environmental justice is without basis.
13 Analyses along specific transportations routes were not
14 compared out and don't support the DOE's findings.
15 I would like to quote from an article
16 about this in terms of an alternative strategy for
17 managing highly radioactive nuclear waste. This was
18 put together for the Institute for Energy and
19 Environmental Research located in Maryland.
20 "A comprehensive alternative for
21 management of highly radioactive waste was unveiled
22 in April of '99, at a press conference by the Institute
23 for Energy and Environmental Research.

7 (cont. on page 6)

24 "The plan calls for cancelation of work on
25 Yucca Mountain and WIPP repositories. The president of

7 continued

IEER says they are technically unfounded and politically motivated. Funding for research for safer disposal alternatives is a better idea.

"The new waste plan recommended three alternative long-term approaches for disposal: Research into various types of geologic repositories with engineered barriers that would mimic natural materials that prevent the spread of radioactivity for millions of years, "Some research into sub seabed disposal which has both advantages and disadvantages relative to geologic repositories, and disposal outside the biosphere by very deep burial in the earth's crust in a layer called the upper mantle."

In a set of articles prepared for the newsletter, Science for Democratic Action, IEER recommended a new federally chartered nonprofit corporation be created to fund on-site storage of power reactors' spent fuel, take over storage from nuclear plant operators when they close the plant, and fund research and development on long-term options.

In a quote from Lee Davy, who is the northern director of Citizen Alert, a grassroots environmental group in Nevada that has sought to stop the repository program for quite some time, the waste management crisis is partly due to the fact that DOE

8 continued on page 7

8 continued

has kept pouring money into the Yucca Mountain site despite evidence that it's a poor site for a waste repository.

For example, 620 earthquakes of varying magnitudes have rattled the Yucca Mountain region in the last 20 years. Moreover, Yucca Mountain is on

9

Western Shoshone land, which was never ceded to the federal government, nor was permission given by the Shoshone for the most dangerous -- to store the most dangerous waste made by man there.

Our government departed from the scientific query where to store nuclear waste when it passed the Nuclear Waste Policy Amendment in 1987 to only study one site in Nevada.

It's time to get back to science. Converting the Yucca Mountain project into a research effort that will never use any radioactive material appears to be a good idea and should be investigated.

10

In response to what about the issue of what to do with spent nuclear fuel, I say stop producing it, and to spend the kind of money that we've spent on this environmental impact statement and the amount of money that will be spent on just security for the transportation route and for all the things that are going on, spend that on alternative energy sources.

1 There are alternative energy sources that are effective
2 and do not create of kind of fear and the kinds of
3 pollution that radioactive waste will.
4 Thank you very much for this opportunity.
5 MR. BROWN: Thank you.
6 The next speaker is Curt Eckhardt.
7 John McClure.
8 Scott Hatfield?