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MR. DeBOTTARI: Lou DeBottari, D-e, capital

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This is my oral summary of my comments. | Volume 1, page 1-19 summarizes the problems with this DEIS. In section 1.4.3.2, Viability Assessment, the second bullet states, quote: "A total system performance based on a design concept and scientific data and analysis available by 1998 that describes the probable behavior of the repository," end of quote.

This report is loaded with wiggle words and computer simulations that are only as good as the data fed into it. It is difficult for me to see how DOE can be so sure that this is the best for this country and for the State of Nevada when their entire argument is based on computer simulations. DOE doesn't trust simulations in other programs that they are responsible for.

For example, after the test ban and underground testing, they still want to perform actual tests on components of the bombs to understand the aging process. They have sophisticated programs that model all the functions and operation of the bomb. It tells me that they do not have the confidence to predict performance 10 years in advance, and yet they want the public to believe that they have the tools to predict the safety of the storage of high level nuclear waste for 10,000 years with respect to public health and safety.

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This is the Achille's heel. The hard data is not available at this time. | It is clear from the data presented for the no action alternative that storage presently being used around the country is safe for at least another hundred years.

DOE attempts to play down scenario one and two, Volume 1, where it says that either one will be likely if there was a decision not to develop a repository at Yucca Mountain. What does this statement mean? The transportation risks are now eliminated, and the country has time to revisit other means of disposal.

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This DEIS attempts to paint a picture that the proposed action is the less costly by use of smoke and mirrors. A few months ago the reported cost for this project was over 60 billion, not

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3 including the cost of monitoring for thousands of years. The report now states the costs are 28.8 billion and would vary somewhat, page 2-5, first paragraph. How much is somewhat?

What is the track record for DOE in bringing projects within budget? DOE as expected priced the no action alternative in the \$50 billion range for the first hundred years.

4 I believe there is a middle-of-the-road approach. Stop work on the construction but do not decommission the site. Because in the no action, you priced in the decommissioning of Yucca Mountain.

Don't decommission it. Continue work on a canister design effort, revisit the use of space as a disposal site, and after a 50-year period come back and revisit all the options.

According to this DEIS, the present storage facilities are good for a hundred years and if refurbished are good for another hundred years. Within that time period I'm sure that this country and possibly the world can come up with a method in which the storage risk is assumed by the generation who start it and not future generations who had no voice in the decision.

5 Page 2-37, section 2.1.2.3, Repository closure, second paragraph. There is no discussed plans on how the sealed repository will be monitored. If there is a monitoring plan, what is the plan? And if the monitoring reports a significant failure due to unseen problems, what do you do? There must be a contingency plan in place before the DEIS is approved.

6 Page 2-69, 2.3.1, Alternatives addressed under the Nuclear Waste Policy Act, first paragraph. The last sentence of the referenced paragraph needs some clarification.

How many and who were on the panel of the National Academy of Sciences in 1990 who made the statement, quote, "that there is a worldwide scientific consensus that geologic disposal, the approach being followed by the United States, is the best option for disposing of high level radioactive waste," end of quote? Who are these experts? I'd like to see that in the report.

7 ... Page 5-17. The following statements sum up the problems with this DEIS. "Similarly," quote -- this is what was quoted. "Similarly, fewer studies or more assumptions produce greater

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7 potential for uncertainty. Longer time scales for forecast produce greater potential for uncertainty, and finally, computation tools or more assumptions produce greater potential for uncertainty," end of quote.

These quotes sum up the problem with this DEIS. DOE wants the public to agree, quote, trust me, without supplying any data. Only simulations.

8 Page 5-28, first paragraph, last sentence. Until now, in this report, DOE has stated that it is difficult to obtain precise values. This section discussed juvenile failures and made the ambiguous statement that they would be very low. DOE proceeded to say that if there were no failures, the mean consequence would decrease by two percent. They have not proven that anything in this DEIS is accurate to two percent.

9 Page 5-43, section Seismic Disturbances, second paragraph. Again, the wobble words, quote, "probably would," end of quote, and "would have to be larger" have no meaning when one attempts to quantify a problem. What is larger to one may be insignificant to another.

We can't at this time quantify an earthquake with any certainty, but DOE attempts, clearly attempts to quantify earthquakes a thousand years in the future. I'm sure the insurance companies and FEMA would like to have their software program.

10 Finally, a good report would indicate what is wrong with the project. DOE is not God, and there must be problems with this project that at this time do not have solutions.

I never trust a report that only tells me the good points. It means the proponents have not fairly analyzed the project. This is a sales brochure, not a study. Thank you.

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