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FURTHER PUBLIC STATEMENT OF LOU DeBOTTARI

MR. DeBOTTARI: This part of my address is the details on the EIS. What I complained about in my oral summary was the adjectives and I want to continue this.

1 On page 2-20, fifth paragraph, you talk about, for example, quote, "decontamination water could be treated -- contaminated water could be treated, could be, and recycled to the extent practicable."

It doesn't make any sense. I mean, that is an easy lazy engineer's way of saying we can do something, but what you can do, I don't know.

2 Paragraph 2-32, third paragraph, "Waste packages are loaded with fissile material and neutron absorbers if needed."

When and who decides this? Why isn't this part of the base line design?

How are we going to know whether it is needed or not? I mean, tell me if it's needed, why don't we put it in? That means you haven't analyzed it very much.

3 Page 2-33, figure 2-20. This DEIS is asking for approval of a project with all the backup data analysis. This is a quote. And yet one of the most critical areas is still labeled potential.

Page 2-34, figure 2-21, these are on the casks. The same comment except in this figure, it's conceptual design.

I can't understand how DOE can do a detailed reliability analysis on a conceptual design. It doesn't make any sense to me.

4 Page 2-40, Section 2.1.3.2, national transportation, second paragraph, last sentence. Please explain why armed escorts would only be required in heavily populated areas. Is each person in a populated area have a higher value?

5 Page 2-43, Section 2.1.3.2.3, mostly rail shipping scenario. Second paragraph. What is the criteria for making the decision on whether DOE will utilize general or dedicated freight service? Isn't this a part of the study that should have been discussed in the DEIS?

6 ... Page 2-57, three bullets indicate DOE will continue

6 design study improvements. Why can't these studies be used in the no action alternative and thus improve the storage life at the various sites?

7 Page 2-61, Section 2.2.2.1, storage packages and facilities at commercial and DOE sites. Fourth paragraph. "Figure 2.38 shows a typical dry storage canister."

Are these canisters the same as what will be used in the proposed action? If not, why not?

8 Page 2-65, high level radioactive waste storage facilities. These are the government facilities. Second paragraph, "The canisters are galvanized steel." Why not stainless?

9 Page 2-69, 2.3.1, alternatives addressed under the Nuclear Waste Policy Act. It is incumbent on DOE to revisit the alternatives that were dismissed in 1981. Some of the data that was used to make decisions was about ten years old at that time.

10 Page 2-87, section 2.6, preferred alternative, second sentence. "The analysis in this EIS did not identify any potential environmental impacts."

A significant amount of the analysis was done with computer modeling in attempting to extend the impacts out many years without the use of real data. DOE, as stated earlier, has no confidence in computer simulations or they would not be testing components of nuclear bombs to see if they would operate properly. Why should we depend on simulations to protect the health and safety of future generations?

11 ... Page 2-88, last sentence. This sentence says it all. A DEIS is prepared to tell the public all the good and bad about the proposed project. The statement that additional field surveys, state and local government consultations, environmental and engineering analysis, and the National Environmental Policy Act reviews will be necessary clearly state that this EIS is not complete. One of the underpinnings of the proposed project is the transportation problems.

I am pleased to read that DOE admits the analysis is not complete, and thus, this DEIS is not ready to be approved by the Secretary of Energy. The additional environmental and engineering analysis must be circulated and public hearings held before the

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11 Secretary can agree that the study is complete.

12 Page 3-79, Section 3.1.8, occupational and public health and safety. This section is a play on numbers. Public health officials are always trading off, for example, the amount of people who will die from a flu shot versus how many will die if there is no flu shot available. All these calculations are irrelevant if there was a method to keep the flu out of the state.

I don't believe it is the number who will die that is important, but the number whose quality of life will be diminished because of the proposed project. This is very difficult if not impossible to quantify, especially when children and pregnant women are factored into the equation.

I saw no data on how the radiation exposure is increased by the concentration of radiation when cows digest grass that is radiated, drink water and then milk sold to citizens. Root plants will also concentrate the radiation. I did not find any mention of this in the report.

13 Page 2-84, Section 3.1.8.3. The discussion focuses on workers in a tunnel. There is no mention of workers who are not in the tunnel but will be exposed to the dust from the material removed from the drilling. What is the impact of strong winds moving the material to the public?

DOE's position is they will, quote, "use the experience gained during environmental studies facility activities to design engineering controls to minimize future exposures."

What does that statement mean? How many will have a reduced quality of life, and how many will die? Are these people working for a company who will come under SIIS? That will cost the people of Nevada more money.

14 ... Section 5.16, Section 5.2.3.6, nuclear criticality. This is typical of this report. Quote, "In addition, it is very unlikely," my answer, what chance, "that a sufficient quantity," how much, "of fissionable materials could accumulate outside the waste packages in the precise," how precise, "configuration and with the required conditions," what are the conditions? "to create a criticality."

"If somehow an external criticality were to occur,

14 analyses indicate, (the information must be available, and why can't it be proven in an experiment) that it would only be minor (what is minor?) on a repository performance."

A reference that supposedly explains the statement is not part of the DEIS. The DEIS is a stand-alone document. It is in a section that was outside, it was letter O or something. It wasn't included in all the additions.

15 Page 5-18, Section 5.2.4.2, uncertainty associated with currently unavailable data. In this section, DOE admits to the lack of data and presents a plan to obtain some data. There is no time lines to show the reader how long it will be before the data DOE believes is necessary will be available.

In Section 5.2.4.3, page 5-19, DOE admits the large degree of uncertainty on the modeling of inputs from ground water migration.

DOE attempts to explain how they handle the uncertainty, and finally stated on page 5-20, last sentence of the first paragraph, "Uncertainty is not always as exact as desired." What does that mean?

DOE uses about four pages to justify the lack of data and reliance on modeling. This is to finally convince the reader that they, DOE, have their arms around the problem and sum it up with Table 5.3 on page 5-22. The column titled Confidence in the models rates various attributes of the repository and principal factors of the design.

DOE gives a rating from high to low and then in the far right column rates the significance of the attribute or factor. The low confidence rating either had a low or medium significance. There should be no approval of this DEIS until DOE can prove that they really have their arms around the problem.

16 Page 5-23, third paragraph. The statement: "The Department in the context of preparing a performance evaluation that provides for a 'reasonable assurance' of safety, generally agrees with the panel's advice."

What does DOE not agree with and why? If you are going to tell me you generally agree with something, I want to know what you don't agree with and why. You said it in there; I want an answer.

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17 Page 5-23, fourth paragraph, last sentence. Quote, "DOE believes the performance results of this EIS are conservative estimates," close quote. The question to be asked: Who knows how conservative the DOE estimates are?

18 Page 5-37, last paragraph, third line. "Zirconium alloy would provide some impediment if the waste packages was breached." Another example of adjectives that have no meaning in an engineering report.

19 Page 5-49, Section 5.10, summary. The analysis is very detailed discussing the latent cancer fatalities with respect to a chosen scenario. For the undisturbed case DOE states, quote, "that is mostly likely that no person would die due to ground water -- "most likely that no person would die due to ground water contamination by radiological material in a 10,000 year period."

I want to know what is the worst case scenario using a pregnant woman and young children to establish the dose rates, and don't use the new dose rate that you guys are trying to put into the record. Use the EPA rate.

20 Page 6-7, the analysis indicates there may be cancer-related deaths due to transportation of material. I want to know the number of people including children and unborn children whose

21 quality of life will be diminished due to exposure. The nuclear industry has received from Congress a liability on limit -- a liability limit on any injury caused by the operation of a nuclear plant. I want an answer on the following: Will this liability limit be extended to the transportation phase of this project?

22 ... Page 6-17, 18, Section 6.2, national transportation. I understand the probability, and if one goes back and examines the train wreck that spilled thousands of gallons of toxic material into the Sacramento River, it probably is outside the limits for the model used by DOE. It only takes one to do significant damage.

The difference between all the past accidents and one that could occur transporting nuclear waste is that past accidents were cured in one lifetime, but the nuclear accident time to cure could extend over many lifetimes. The reference section is again laced with adjectives that do not belong in an engineering document.

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22 If you can state it is not likely or very unlikely, state the probability.

23 Page 6-24, Table 6-6. I want to know the exposure to a person with a baby who is next to a mostly legal weight truck that is stopped next to her in the traffic jam when she is not more than ten feet from the truck. This should be included in Table 6-6.

24 Page 6-25, last sentence. DOE attempts to show that the natural environment is a big factor and approximately 2.9 million members of the referenced population will incur fatal cancers from all other causes and thus their conclusion is the project causes a very insignificant amount. (2) A more cogent question would be how many of the 2.9 million lives were shortened due to the project?

25 6-28, block at the bottom of the page. DOE uses the argument that if an accident is not reasonable, it is not analyzed. This is defined by the conditions that occur more often than one in ten million times a year. They eliminate any conditions that occurs less than that number.

The public should be told of what can happen because if it can, it will in the years that material is being transported. In other words, don't use that. I want to know outside of that, because I maintain if it can happen, it will happen during the time that you are transporting materials in this country. Thank you.

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