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DOE DEIS for a Geological Repository for the Disposal of Spent Nuclear Fuel + High-Level Radioactive Waste (Draft Env. Imp Statement)

I want to address my comments to the issue of the appropriateness of Yucca Mt as a site for permanent disposal of nuclear waste.

1 First I want to state that I do not believe that we should be establishing any permanent site at this time. Our knowledge and ability to predict the future is not great enough to decide to commit to a permanent site and method of disposal. Rather we should wait until we have more knowledge and more competent and tested technology in this field.

In the meantime we should store our nuclear waste in a limited number of regional sites that are relatively close to the source of origin. We should use above ground storage that can be monitored and guarded. While this solution obviously has its problems to, it is a better solution now than ~~and~~ the uncertainty and risk involved in permanent disposal. It also is a more responsible position. If we bury our waste now, we may be able to escape the consequences of contamination in our lifetime and the lives of our children but we are really just pushing the hazards off to future generations. We should take full responsibility for our nuclear waste and live with it until we can find a safer solution.

Our search should be for the least dangerous, most equitable method or methods of retaining control of nuclear wastes in a manner that will best assure future populations will have an opportunity equal with our to be able to continue control for the duration of the hazardous lifetime.

2.... Now I would like to make some more specific comments on Yucca Mt. First of all, Yucca Mt is a great distance from most sources of nuclear waste. Thus we are faced with all the concerns

2 cont. expressed today regarding rail and truck traffic. In the St Louis area we would see an increase in traffic. We would be at risk for accidents and criminal actions related to nuclear traffic. It makes no sense for our areas and many other parts of the country to face this risk especially because the site at Yucca Mt is not well suited for nuclear disposal. Why risk the trip when the destination is not adequate?

3 Yucca Mt is not adequate because of geological risks. Studies of the fissures in the rocks of the area indicate that both radioactive water and gas may escape. Heat from the waste itself may generate problems. Hot water from below the site associate with volcanic activity poses a risk. The site is riddled with seismic faults. The DEIS has not dealt adequately with these risks.

4 It is clear from research at Yucca Mt and surrounding area that we do not have a clear understanding of underground water dynamics. Further new information from other sites on the heretofore unknown rapidity at which radioactive substances can move in groundwater makes this issue even more troubling.

5..... Assessing the appropriateness of Yucca Mt. involves projections of climate and geological activity thousands of years in the future. We are simply not equipped to make these projections accurately enough on matter this serious. In fact, as reported in the Oct 99 issue of Science magazine there is less reliance on geology in the geological disposal of nuclear waste than most people realize. This is because on the time scales we must deal with in regard to these hazardous substances, our knowledge is too weak and geological and climatic forces too variable over long periods of time to warrant much reliable forecasting. Thus, we are left depending more on man

5 cont. made barriers than we may want to admit. That uncertainty makes it particularly absurd to risk transporting nuclear waste long distances to a site that is not adequate.

6 The public should also be alarmed at DOE's attempt to relax and reduce standards along the way in an effort to change to rules to make Yucca Mt appear to meet licensing standards. It has appeared at several junctures that the DOE wants Yucca Mt declared suitable and has not conducted the DEIS process with an open mind.

We encourage DOE to reject Yucca Mt as depository site, spare the midwest and other areas of the country the risk of what has been dubbed the mobile chernobyl and take a serious and open minded approach ~~to~~ in how to deal responsibly with our nuclear waste

~~Respectfully~~

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